

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

JAN 2 3 2018

WG-15J

Amy Klei, Acting Chief Division of Drinking and Ground Waters Ohio Environmental Protection Agency P.O. Box 1049 Columbus, Ohio 43216-1048

RE: Fiscal Year (FY) 2016 End-of-Year Evaluation (EOY) for the Public Water System Supervision (PWSS) Program Grant

Dear Ms. Klei:

This letter transmits the PWSS program EOY evaluation, which documents activities performed by both the Ohio Environmental Protection Agency (Ohio EPA) and the United States Environmental Protection Agency under the FY 2016 PWSS workplan.

During 2016, Ohio EPA continued to meet requirements to maintain primacy of the drinking water program and public water systems (PWSs) continued to maintain high compliance rates with drinking water regulations. In addition, Ohio is commended for exceeding its Enforcement targeting commitment by addressing 74 systems on the Enforcement Targeting Tool list.

Ohio EPA continued to emphasize compliance in FY 2016 by implementing the program for expedited settlement agreements for systems with certified operator violations and total coliform and nitrate monitoring violations. In FFY 2016, Ohio EPA sent 187 warning letters, issued 42 Streamlined Orders, and 14 Administrative Orders. As a result, during SFY 2016, 99 percent of operators were properly certified.

As of October 2016, there were 846 community water systems (CWSs) substantially implementing protective strategies. During SFY 2016, Ohio completed 121 source water assessment reports and endorsed six of the seven source water protection plans developed by PWSs.

Region 5 appreciates Ohio EPA's presentations and participation in the CWA/SDWA Harmful Algal Blooms (HABs) workshop in April, 2016, as well as the national EPA webinars. Sharing Ohio's experience is invaluable to other states and tribes. Ohio EPA continues to work with PWSs to monitor raw and finished water in accordance with Ohio's PWS HAB Response Strategy. In addition, Ohio EPA worked with many State, Federal, and academic partners during FFY 2016 to expand knowledge and research into HABs.

Ohio EPA is implementing all of the drinking water rules with the exception of a few Consumer Confidence Report Rule and Public Notification Rule activities for which the state submitted a plan and schedule on November 4, 2016 to address those areas. Ohio EPA continues to make significant investments in core aspects of the drinking water program, including sanitary surveys, data management, development of enforcement procedures to ensure consistent implementation, capacity assurance, source water protection, and ground water quality characterization. There is a direct correlation between the up-to-date sanitary survey visits, low violation rates, innovative programs to ensure compliance, and dedicated staff in the drinking water program.

In conclusion, we find Ohio EPA implementing a successful PWSS program under the SDWA in Ohio, which ensures public health protection to consumers. We also find Ohio EPA to be efficient with managing resources in a way that maximizes its ability to meet current and future program challenges. As always, EPA offers continued support to help meet these challenges. If you have questions or concerns regarding this report and/or current or future program needs, feel free to call Tom Poy of my staff at (312) 886-5991.

Sincerely,

Christopher Korleski

Director, Water Division

Enclosure

FY2016 OHIO EPA PUBLIC WATER SYSTEM SUPERVISION PROGRAM END-OF-YEAR SUMMARY October 1, 2015, through September 30, 2016

Contacts:

- Ohio EPA Division of Drinking and Ground Waters (DDAGW) Assistant Chief Beth Messer, beth.messer@epa.ohio.gov, (614) 644-2752
- U.S. EPA Region 5 Ohio State Program Manager Wendy Drake, <u>drake.wendy@epa.gov</u>, (312) 886-6705

Federal funding used—Public Water System Supervision (PWSS) grant; Drinking Water State Revolving Fund (DWSRF) small systems technical assistance (SSTA), PWSS, and local assistance and other state programs set-asides; and Clean Water Act Section 106 funds (ground water)

FY 2016 end-of-year (EOY) evaluation synopsis—Ohio EPA continues to meet requirements to maintain primacy of the drinking water program, and public water systems (PWSs) continue to maintain high compliance rates with drinking water regulations. Analysis of the various programs within Ohio's drinking water program indicates public health protection is the top priority. In FY 2016, Ohio EPA exceeded its targets for two of the three national program measures related to community water systems (CWSs) meeting health-based standards (SDW-SP1.N11 and SDW-SP2). In addition, regarding measure SDW-01a, as of July 2016, 98.4% (1,189 out of 1,208) of the sanitary surveys at CWSs were completed between calendar years (CY) 2013 and CY 2015. Further, Ohio EPA's PWSS program is experiencing the lowest percentage of noncompliance ever. However, national measure SDW-211 (percent of population served by CWSs that receive drinking water that meets all applicable healthbased drinking water standards, etc.) was not met, because of a PWS violation in Columbus (nitrate maximum contaminant level (MCL) violation—10.5 mg/L; MCL is 10 mg/L), a very large population city. (The measures and indicators summary provides more details on the results from all of the national and regional measures.) Ohio EPA continues to make significant investments in core aspects of the drinking water program, including sanitary surveys, data management, development of enforcement procedures to ensure consistent implementation, capability assurance, and source water protection (SWP) and ground water quality characterization. There is a direct correlation between the up-to-date sanitary survey visits to around 4,750 PWSs, low violation rates, innovative programs to ensure compliance, and the dedicated staff in the drinking water program. Staff resources must be maintained to ensure the type of results discussed in this evaluation. In addition to the PWSS program activities conducted in FY 2016 described below, DDAGW continued to expend major resources managing harmful algal bloom (HAB) toxins in PWSs. DDAGW continues to work with PWSs to monitor raw and finished water in accordance with Ohio's PWS HAB Response Strategy. DDAGW worked with many state, federal, and academic partners during federal fiscal year (FFY) 2016 to expand knowledge and research into HABs. In addition to its work on HABs, other parts of Ohio EPA's drinking water program continue to innovate to protect public health—for example, through the lead and copper rules, as well as asset management implementation and contingency planning requirements.

1. Rules and primacy—Ohio EPA is implementing all of the drinking water rules, with the exception of a few CCR and PN activities for which Ohio EPA submitted a plan and schedule on November 4, 2016. Ohio does not yet have primacy for the Revised Total Coliform Rule (RTCR), the arsenic rule, Long Term 2 Enhanced Surface Water Treatment Rule (LT2), Ground Water Rule (GWR), and Stage 2 Disinfectants and Disinfection Byproducts Rule (Stage 2). However, Ohio has interim primacy for all of these rules, because the attorney general certifications have been received. Region 5 will

determine whether primacy applications are complete, track primacy submittal/review for all rules, and provide comments on draft rules, as requested. R5 agrees to provide Ohio EPA with correspondence on necessary revisions to RTCR, LT2, Stage 2 D/DBPR, arsenic rule, GWR, and SWTR minor amendments by December 31, 2017.

In FY16, R5 requested information about state and PWS lead action level exceedance follow-up activities. Region 5 will track state reporting of certain rule violations (RTCR, LT2, GWR, LCRSTR, and Stage 2 D/DBPR, as well as 141.130(c) operator certification treatment technique violations). As of January 2017, Ohio had reported to the federal version of the Safe Drinking Water Information System (SDWIS/FED):

- RTCR: R5 will track these violations in the future.
- LT2: 31 TT violations and 3 M/R violations
- GWR: 5 TT violations, 427 M/R violations, and 1 other violation
- Stage 1: 0 (type 12—"failure to have a certified operator") violations
- Stage 2: 233 MCL/MRDL and 460 M/R violations
- LCRSTR: 577 M/R violations

Ohio EPA FFY 2016 End-of-Year Summary: In FY 2016, Ohio EPA's DDAGW worked on implementation of the new RTCR, HAB rules, and began drafting lead and copper regulations to meet the requirements of H.B. 512. A significant deficiency procedure was drafted but will need to be updated with revisions adopted with the RTCR, which will align significant deficiencies under the RTCR, GWR and SWTR. The RTCR SOP is still being drafted, but implementation began April 1, 2016. Beginning June 1, 2016, Ohio EPA fully implemented the HAB rules.

2. **Sanitary surveys**—Ohio EPA will maintain a baseline core of individuals with the technical expertise needed to perform sanitary surveys. Ohio will ensure sanitary surveys are conducted periodically, at a minimum, meet frequency requirements specified by rule. Region 5 will track state commitments to conduct sanitary surveys within the federally required intervals through a sanitary survey completeness high priority query, as well as the national water program measure, SDW-01a:

National water program measure SDW-01a:

 SURFACE AND GROUND WATER SYSTEMS: As of July 2016, 98.4% (1,189 out of 1,208) of the sanitary surveys at CWSs were completed between CY2013 and CY2015. States had until March 2016 to report CY2015 sanitary survey data for this national measure.

Sanitary survey completeness high priority query:

- SURFACE WATER SYSTEMS: As of October 2016, 80.3% of the surface water CWSs (220 out of 274) completed sanitary surveys between CY2014 and CY2016. In addition, 100% of the surface water non-transient, non-community water systems (NTNCWSs) (11) and 100% of the transient, non-community water systems (TNCWSs) (6) completed sanitary surveys between CY2012 and CY2016.
- GROUND WATER SYSTEMS: As of October 2016, 83.9% of the ground water CWSs (784 out of 934) completed sanitary surveys between CY2014 and CY2016. In addition, 91.6% of the ground

water NTNCWSs (564 out of 616) and 90.6% of the ground water TNCWSs (2,290 out of 2,529) have completed sanitary surveys between CY2012 and CY2016.

Ohio EPA is commended for continuing to make significant investments in sanitary surveys, a core aspect of the drinking water program.

Ohio EPA FFY 2016 End-of-Year Summary: Surveys conducted during FFY 2016 met the eight survey components. During FFY 2016, Ohio conducted a total of 1,101 sanitary surveys; 397 at CWSs, 171 at NTNCWSs, and 533 at TNCWSs, including 88 at surface water systems.

In FFY 2016, DDAGW began using an agency-wide inspection template for sanitary surveys. The new letters separate notices of violations from recommendations.

DDAGW continued work on moving to the Global Environmental Consulting Safe Water Information Field Tool (SWIFT) in FFY 2016. Piloting of SWIFT began at the end of state fiscal year (SFY) 2016. After SWIFT is implemented, the Sanitary Survey workgroup will begin revising the Sanitary Survey SOP, which will include tracking Sanitary Survey requirements and using appropriate inspection templates.

Ohio EPA implemented field and desktop audits of sanitary surveys for surveys completed after July 1, 2015. The audits are being conducted to ensure consistency statewide. The review includes clarity of the letter, format, records management and compliance with state and federal laws.

Ohio EPA holds semi-annual Inspector Forums designed to bring all district office inspectors together for a day of discussion, sharing experiences and gaining knowledge on preselected topics of interest. The goal of the forums is to increase collective knowledge and statewide consistency for the sanitary survey process.

3. Laboratory certification—R5 expects to conduct a lab audit and program review in Ohio in FY 2017. The state is expected to: (1) establish and maintain a state program for the certification of laboratories that analyze drinking water contaminants, and (2) assure availability of certified laboratory facilities capable of analyzing all contaminants in the state primary drinking water regulations. The Ohio EPA certification program is managed by the Ohio EPA's Division of Environmental Services. Ohio EPA agrees to certify all laboratories that produce results for compliance with SDWA at least once every three years and will meet all requirements of 40 CFR parts 141 and 142. During December 2013, Region 5 conducted an audit of the Ohio EPA principle state lab. Audit findings were issued in April 2014 and full certification was issued on January 22, 2015. According to the 2014 annual Region 5 laboratory certification program assessment, Ohio doesn't anticipate any laboratory capacity issues for any of the regulated drinking water contaminants or any resource issues.

Ohio EPA FFY 2016 End-of-Year Summary: In FFY 2016, laboratory certification staff performed 360 on-site visits. Beginning June 1, 2016, the certification for microcystin took effect.

4. **Compliance and enforcement management**—Ohio EPA is expected to evaluate compliance with all drinking water rules and respond to violations by providing compliance assistance or enforcement as appropriate. Ohio EPA is also expected to keep adequate records of pertinent state decisions. Region 5 continues to look to states to refer noncompliant PWSs.

Ohio EPA also posts lists of potential violators, and they now have noncompliance documents since January 1, 2007, available online via their <u>public records</u> website through an eDocument Search. Eventually, electronic copies of most of the agency's public records will be available.

ENFORCEMENT TARGETING TOOL: Region 5 tracks state commitments under measure SDWA02 and updates Ohio EPA quarterly. Ohio's FFY 2016 end-of-year results show that Ohio had addressed 74 systems (25 from the original 32 on the July 2015 fixed base list plus an additional 49 that had become priority systems after July 2015). Ohio is commended for this accomplishment in well exceeding its 2016 commitment.

Ohio EPA FFY 2016 End-of-Year Summary: DDAGW continued to emphasize compliance in FY 2016 by implementing the program for expedited settlement agreements for systems with certified operator violations and total coliform and nitrate monitoring violations. In FFY16, Ohio EPA sent 187 warning letters, issued 42 Streamlined Orders and 14 Administrative Orders. For the second consecutive year, according to Ohio's data, Ohio has met shared goal 7 (less than 10 percent of TNCWSs with significant/major monitoring violations) in FFY 2016.

5. Data management and reporting—Ohio EPA is expected to maintain a data management system that tracks requirements for all drinking water rules, which includes the appropriate combination of hardware, software, and personnel to accurately and within a reasonable timeframe identify the inventories (including routine updates of system information), maintain water quality monitoring information, and track compliance with all M/R, MCL, MRDL, TT, PN, and public information requirements. States must report to EPA actions and sample data quarterly and inventory data at least annually in accordance with 40 CFR 142.15. Ohio EPA is using SDWIS/State 3.33 and is reporting with FedRep 3.51, the latest versions of these applications. Ohio is commended for being up-to-date on SDWIS/State software upgrades. Ohio continues to meet the quarterly deadlines for reporting data to the national database, SDWIS/Fed-ODS.

Ohio EPA FFY 2016 End-of-Year Summary: Ohio EPA continued to develop several standard operating procedures for SDWIS components:

- RTCR SOP is under development.
- Chem/Rad SOP is under revision to incorporate Stage 2.
- TCR, GWR, and Rescind/RTC SOP completed.
- Lead and Copper SOP will be revised with the new Lead and Copper rules Ohio EPA will adopt in FFY 2017.

DDAGW worked on the SOP for significant deficiencies, but will need to update it with revisions adopted with RTCR, which will align significant deficiencies under RTCR, GWR and SWTR.

Ohio EPA finished the testing of SDWIS 3.33 and migrated version 3.33 to production on 5/16/2016.

In preparation for the move to SDWIS Prime, Ohio EPA has purchased from GEC the Safe Water Information Field Tool (SWIFT) to replace the Electric Sanitary Survey (ESS) currently used by field staff. SWIFT will be hosted in the GEC cloud environment. Staff will access SWIFT using

tablets with a data plan. This will allow staff to have real time access to SDWIS data during a survey. For surveys where access to a cellular sign is limited or not available, there will be an off-line application available where the survey can be downloaded prior to going out in the field. Work completed so far includes: migration of the question set, purchasing of iPads for pilot testing, hosting environment setup, and connectivity between SDWIS and SWIFT. The implementation of SWIFT was delayed during FFY 2016 because other issues of higher priority needed to be addressed. Ohio plans to refocus their efforts after January 2017 to clean up the question set and begin piloting the SWIFT software.

 Security—Ohio EPA is expected to adopt and implement an adequate plan for the provision of safe drinking water under emergency circumstances including, but not limited to, earthquakes, floods, hurricanes, and other natural disasters.

Ohio EPA FFY 2016 End-of-Year Summary: Ohio EPA continued to facilitated discussions with public water supplies, county health departments and emergency management directors for contingency planning. Ohio EPA staff participated in two exercises hosted by the state emergency management agency. Ohio EPA participated in quarterly coordination meetings with Ohio's emergency response partner agencies. Ohio EPA provided review and revisions to the Ohio's Emergency Operations Plan and Recovery Strategies related to water infrastructure. Ohio EPA staff provided review of HAB contingency plans for surface water systems susceptible to blooms. Ohio EPA Staff participated in quarterly water security conference calls with U.S. EPA Region 5. Ohio EPA staff participated in the development of a tabletop exercise for water and wastewater utilities that will be conducted in FY 2017.

Ohio EPA established a webpage for security and emergency preparedness.

7. **Operator certification**—Ohio EPA establishes and maintains minimum professional standards for the operation and maintenance of all PWSs to ensure that properly trained and certified professionals are overseeing the treatment and distribution of safe drinking water and to promote compliance. Ohio annually—by September 30th each year—provides documentation to EPA showing the ongoing implementation of the program to avoid 20% withholding of the DWSRF grant. Annual reports must include operator certification reporting measures.

Ohio's implementation of the operator certification program complies with the requirements of the federal operator certification guidelines. Ohio continues to recognize the importance of properly trained and certified operators in protecting public health. Region 5 believes Ohio EPA has a strong operator certification program and has a very capable and dedicated staff. Region 5 commends Ohio EPA for implementing an effective program.

During FY 2017, Region 5 plans to re-evaluate the Region 5 states' operator certification programs, to ensure the nine Baseline Standards are met, as outlined in EPA's Operator Certification Guidelines.

Ohio EPA FFY 2016 End-of-Year Summary: Activities taken by Ohio EPA to ensure operators are appropriately certified include overseeing the certification of 5,893 drinking water operators with active certificates. During SFY 2016, 99 percent of operators were properly certified. Ohio EPA provided free web-based training for Class A operators. During FY 2016, approximately 899 operators took advantage of the third party examinations.

8. **Capacity development**—Ohio EPA ensures that new and existing CWSs/NTNCWSs can demonstrate technical, managerial, and financial capacity to operate in compliance with federal and state regulations. Ohio annually—by September 30th each year—provides documentation to Region 5 showing the ongoing implementation of both the new systems program and the existing systems strategy to avoid 20% withholding of the DWSRF capitalization grant. The annual report should address the capacity development reporting measures. Every three years, states are required to submit a report to the governor and provide a copy to R5 on the efficacy of the strategy and the progress made toward improving the capacity of water systems in Ohio. The next report to the governor is due October 1, 2017.

The Drinking Water Assistance Fund (DWAF) program includes incentives in the DWSRF point structure for effective management, such as utility board training requirements associated with loan awards, conservation, preventative maintenance, regionalization/consolidation, backflow prevention programs, contingency plans, endorsed protection plans, asset management plans, and projects consistent with sustainable growth plans. Ohio EPA uses the DWSRF small systems technical assistance set-aside to fund a contract with Great Lakes RCAP to assist PWSs serving 10,000 people or less with increasing their technical, managerial, and financial capacity, for example, by conducting energy audits and providing training to local officials on asset management and maximizing system efficiency and sustainability with reduced resources, including free, online training.

Ohio is commended for continuously improving its capability assurance program; forming a capability assurance workgroup; offering free, online training, such as utility management and asset management, to improve systems' capabilities and sustainability; and developing a capability screening tool that identifies and prioritizes system deficiencies and incorporates sustainability activities.

Ohio EPA FFY 2016 End-of-Year Summary: In FFY 2016, DDAGW drafted rules and worked to pass legislation to require all PWSs to maintain a written asset management program. The capability screening tool was implemented with all Water Supply Revolving Loan Account (WSRLA) applicants and other systems that appeared to lack capability. The screening tool identifies areas for improvement needing to be addressed in capability assurance plans.

9. Source water assessments and protection—Ohio EPA's SWP program is funded by the DWSRF state program management or PWSS set-aside, as well as the local assistance and other state programs set-aside, the CWA Section 106 grant, and state drinking water fees. EPA requests that states report the number of CWSs with SWP plans and the number of CWSs implementing SWP measures as of June 30 by August 15 each year. Ohio EPA is reporting this information electronically via SDWIS. Ohio's program is voluntary. Ohio EPA updates source water assessments, as resources allow, and completes source water assessment reports for new PWSs.

DDAGW also assists Ohio EPA's Division of Surface Water in assessing surface waters designated as a public water supply beneficial use.

Ohio EPA reported SWP substantial implementation information and surpassed both of the FY 2016 SWP commitments. Specifically, Ohio minimized risk to public health through SWP for 69% of CWSs (2016 state target: 50%) and 87% of the population served by CWSs (2016 state target: 66%), where "minimized risk" is achieved by substantial implementation, as determined by the state, of actions in a PWS's SWP strategy. *Note:* These end-of-year numbers were provided by

Ohio. The "measures and indicators" summary includes the numbers that were submitted for national measures SP4A and SP4B, and the reason for the difference between the two sets of numbers is explained in that document.

Ohio EPA FFY 2016 End-of-Year Summary: As of October 2016, there are 846 substantially implementing CWSs, which includes CWSs purchasing water from systems substantially implementing protective strategies. During state program year 2016, Ohio completed 121 source water assessment reports and endorsed 6 of the 7 SWP plans developed by PWSs received in SPY 2016. Ohio received and accepted checklist-style protection plans from 53 non-municipal systems in SPY 2016. Ohio EPA completed modification to its criteria for substantial implementation. In the future, Ohio EPA will utilize its triennial "SWAP surveys" as the primary basis for evaluating implementation status. The next survey will be conducted in 2018.

- 10. **Measures and indicators**—There are multiple national water program measures in the national program manager guidance that support the "water safe to drink" subobjective 2.1.1 in EPA's strategic plan, and Region 5 is also tracking several other measures, including those in the Region 5 shared goals and Region 5 high priority SDWIS/FED queries. The most recent data for Ohio for each of these measures are available via the "measures and indicators" summary file, some of which have been described above in this work plan summary.
- 11. Resources and expertise—Ohio EPA maintains a baseline core of individuals with the technical expertise to carry out all mandatory components of the PWSS program (including engineering plan and specification review and emergency response). Contracts with third parties conducting mandatory components of the PWSS program will make performance expectations clear and will be measured and evaluated by Ohio EPA. Ohio EPA develops and implements a plan to provide adequate funding to carry out all functions of the PWSS program. The state has primacy for implementing the National Primary Drinking Water Regulations and is expected to fully implement all aspects of its safe drinking water statutes and rules on which primacy is based. If the state is unable to implement any portion of such a statute or rule, or otherwise comply with the federal implementation regulations, the state must submit a plan describing the steps the state will take to achieve full implementation and a schedule for doing so. This plan and schedule must be submitted within 90 days of the award of the FY17 PWSS grant. See Ohio EPA's plan and schedule submitted on November 4, 2016.
- 12. Harmful Algal Blooms (HABs)—Region 5 appreciates Ohio EPA's presentations and participation in the CWA/SDWA HAB workshop in April 2016, as well as the national EPA webinars. Ohio's willingness to take the time to share HABs-related expertise and lessons learned is invaluable to other states and tribes. During FFY 2016, Ohio EPA established a new HAB section with dedicated staff to implement the new rules, provide technical assistance to PWSs for prevention and response, and provide assistance responding to HABs in recreational waters. FFY 2016 activities included:
 - Finalized new and amended rules on HABs, effective on June 1, 2016, establishing action levels for microcystins, cyanotoxin monitoring requirements for PWSs, treatment technique requirements, and public notification and reporting requirements
 - Completed microcystins analytical method comparison study
 - Required susceptible PWSs to add HAB response activities to their contingency plans
 - Provided comments on U.S. EPA HAB guidance
 - Conducted HAB treatment optimization outreach to PWSs

- Conducted HAB rule outreach to PWSs (6 events)
- Conducted HAB outreach sessions to local officials (6 events)
- Recorded 2 HAB rule webinars
- Developed Treatment Optimization Protocol Guidance
- Developed Cyanotoxin General Plan Guidance
- Developed HAB sampling video
- Developed Analytical Method (705.0) Quantitative Polymerase Chain Reaction (qPCR) for Determination of Cyanobacterial and Cyanotoxin-Producing Genes Updated Analytical Method for Total (Extracellular and Intracellular) Microcystins - ADDA by ELISA Analytical Methodology (Version 2.0)
- Revised the 2016 PWS HAB Response Strategy
- Revised the 2016 PWS HAB Recreational Waters Response Strategy
- Assisted AWWA Technology Committee with white paper on cyanotoxin treatment
- Maintained map-based online cyanotoxin monitoring webpage
- Evaluated and responded to cyanobacteria screening results (qPCR) at Ohio PWSs (June-September 2016)
- Provided on-site technical assistance to PWS dealing with cyanotoxin detections (reservoir sampling and analysis, treatment train analysis)
- Coordinated cyanobacteria screening sample shipping hubs at multiple locations across the state to assist PWSs with timely sample shipments to the Ohio EPA Division of Environmental Services (DES) Laboratory
- Completed a Comprehensive Performance Evaluation with U.S. EPA in August 2016 at Ottawa County Regional PWS (3 more events scheduled for 2017)
- Ohio River Response additional sampling was conducted in response to the Ohio River HAB
 in 2015 and technical assistance to Ohio River PWS and coordination with the Ohio River
 Valley Water Sanitation Commission (ORSANCO)

Many of the activities listed above are required by Ohio Law (Senate Bill 1) directing Ohio EPA to implement actions to protect against cyanobacteria in the western basin of Lake Erie and in PWSs. HAB-related rules (OAC Chapter 3745-90) and revised Laboratory Certification rules (OAC Chapter 3745-89) became effective on June 1, 2016.

Resources – During the reporting period, 6.3 FTEs were utilized to complete HAB-related activities including the creation of several new positions in the Central Office and the District Offices. The new HAB Section was formed in February 2016 with positions filled throughout the remainder of the year. From October-February 2015, SWP staff were also utilized to complete some of the activities listed above. For the October 1, 2015, through September 30, 2016, time period, staff coded a total of 13,062 hours to HAB-related activities.

Funding – Ohio EPA revised its Drinking Water Assistance Fund program plan to provide \$1.5 million in grant funding through the local assistance and other state programs set-aside to PWSs to purchase cyanotoxin analytical equipment. Ohio EPA awarded grants to 67 water systems and ORSANCO. Ohio reimbursed \$1.2 million.

Also, Ohio EPA made available \$150 million to eligible water systems to fund HAB projects. To date, nine (9) HAB loans have been awarded for a total of \$78 million. The HAB loans were to Toledo (2), Avon Lake (2), Celina, Sandusky, Painesville, Oregon and Bowling Green. Approximately \$72 million remains available for applications in PY 2017 (7/1/16-6/30/17).

Analysis – Ohio EPA and Ohio PWSs analyzed over 5,800 samples for total microcystins, and Ohio EPA's lab analyzed nearly 2,000 cyanobacteria screening samples (qPCR) and over 550 samples for saxitoxins. There was 100% compliance with the monitoring requirements. Microcystin detections triggered development of Treatment Optimization Protocols at 51 PWSs and Cyanotoxin General plans at two PWSs.

Occurrence – All of the surface water systems in Ohio have been sampled for microcystins and cyanobacteria screening (qPCR). Starting June 1, 2016, and continuing through September, all surface water PWSs collected weekly raw and finished water samples for total microcystins and a bi-weekly cyanobacteria screening sample in the raw water. Microcystins were detected in the raw water at 41 PWSs (33% of all surface water systems), but there were no finished water detections. Nearly all of the Lake Erie PWSs has raw water detections and all had microcystin gene detections at some point during the season. Based on the cyanobacteria screening results, Ohio EPA conducted follow up sampling for cyanotoxins at nearly 40 PWSs. A total of 33 PWSs (27%) had saxitoxin gene detections and saxitoxin was detected in raw water at 15 PWSs (12%). There were also finished water saxitoxins detections at six (6) systems in 2016. Ohio EPA followed its HAB strategy following all finished water detections for saxitoxins, and there were no advisories issued. Ohio EPA provided extensive technical assistance to all PWSs with finished water detections. The cylindrospermopsin gene was only detected in one sample and the toxin was not detected in the follow up sample collected by Ohio EPA.

FY2016 Ohio EPA PWSS Rules and Primacy Work Plan Summary

October 1, 2015 through September 30, 2016

Federal funding used: PWSS grant and DWSRF SSTA, PWSS, and local assistance and other state programs set-asides

Ohio EPA contact: Beth Messer, <u>beth.messer@epa.ohio.gov</u>, (614) 644-2752 Region 5 contact: Wendy Drake, <u>drake.wendy@epa.gov</u>, (312) 886-6705

RULE	LEGAL STATUS	TECHNICAL CONTACTS	EXPECTATIONS	EVALUATION
1 – SWTRs	SWTR,	Ohio EPA	Federal Expectations	<u>Discrepancies</u>
	IESWTR, LT1,	Judy Stottsberry	See the federal expectations	None.
	and FBRR:	judy.stottsberry@epa.ohi	file (the annual resource	
	primacy	o.gov; (614) 644-3050	deployment plan or ARDP).	Milestones
				Ohio submitted a final primacy revision package for
	LT2: interim	U.S. EPA Region 5	State Commitment	LT2 on 12/4/12. Ohio submitted a final primacy
	primacy; LT2	Andrea Porter	Complete.	revision package for SWTR minor amendments on
	application	porter.andrea@epa.gov;		3/17/15.
	under review	(312) 886-4427	Region 5 Assistance	
			R5 is reviewing the LT2	Ohio is reporting LT2 treatment technique (TT)
			application and SWTR minor	violations. As of January 2017, 31 TT violations and
			amendments. R5 submitted	3 monitoring and reporting (M/R) violations were
			questions on the SWTR	reported to SDWIS/Fed.
			amendments on 9/1/16, and	
			the state responded on	Ohio EPA 2016 EOY: Procedure for reviewing SWTR
			10/31/16.	MORs has been developed and is being
				implemented. Significant deficiency procedure is
				drafted but will need to be updated with revisions
				adopted with RTCR which will align significant
				deficiencies under RTCR, GWR and SWTR.
				Provided training in May 2016 for all Schedule 3
				PWSs on how to complete a sampling plan and
				summary of LT2 requirements.
				Summary of L12 requirements.
				Accepted all Schedule 3 PWS sampling plans.
				18 Schedule 3 PWSs started their second round of
				source water monitoring during FFY 16.

RULE	LEGAL STATUS	TECHNICAL CONTACTS	EXPECTATIONS	EVALUATION
RULE 2 –RTCR	TCR: primacy RTCR: interim primacy; application under review	Ohio EPA Bridgette Marchio Bridgette.Marchio@epa.o hio.gov (614) 728-3870 U.S. EPA Region 5 Miguel Del Toral deltoral.miguel@epa.gov; (312) 886-5253	Federal Expectations U.S. EPA is aware that Ohio EPA has experienced setbacks related to tracking RTCR requirements through SDWIS/State, because EPA's SDWIS Prime rollout has been delayed. The data entry instructions were distributed to states on 1/10/17. See also the federal expectations file.	All Schedule 1 and Schedule 2 PWSs are monitoring during FFY 16. Ohio is using SDWIS to track second round monitoring. Discrepancies None. Milestones R5 will begin tracking RTCR violations in the future. Ohio EPA 2016 EOY: In FY 2016, Ohio EPA worked on implementing the new RTCR. A significant deficiency procedure was drafted but will need to be updated with revisions adopted with the RTCR, which will align significant deficiencies under the RTCR, GWR and SWTR. The RTCR SOP is still being drafted, but implementation began April 1, 2016. Workgroup worked on preparing RTCR, both rules
			State Commitment Ohio EPA sought interested party comment on RTCR in early 2015, adopted the rules on 3/21/16, which were effective 4/1/16. The RTCR primacy application was submitted to R5 on 1/15/16, the attorney general (AG) certification was submitted on 10/28/16, and the SOP was submitted on 12/29/16. Region 5 Assistance	Workgroup worked on preparing RTCR, both rules and implementation issues. The initial round of interested party review for the RTCR was conducted from 2/10/15-4/13/15. Anticipate adopting rules by early 2016 to be effective 4/1/16. Also, new penalty program for failure to monitor for total coliform and nitrate began implementation 1/1/14 and is resulting in improved compliance rates. Drafting the RTCR standard operating procedures in FF 2016 and will provide to FF 2017.

RULE	LEGAL STATUS	TECHNICAL CONTACTS	EXPECTATIONS	EVALUATION
			R5 plans to review the RTCR	
			SOP in addition to the	
			primacy application.	
3 – GWR	interim	Ohio EPA	Federal Expectations	<u>Discrepancies</u>
	primacy;	Todd Kelleher	See the federal expectations	None.
	application	todd.kelleher@epa.ohio.g	file.	
	under review	<u>ov</u>		<u>Milestones</u>
		(614) 644-2752	State Commitment	Ohio EPA is using SDWIS/State 3.33 and FedRep
			Complete. Ohio submitted	3.51, the latest versions of SDWIS/State and
		U.S. EPA Region 5	the GWR primacy application	FedRep, to report to SDWIS/Fed ODS.
		Mostafa Noureldin	on 1/18/13 and submitted	
		noureldin.mostafa@	the AG certification on	Ohio is reporting GWR violations. As of January
		epa.gov; (312) 353-4735	7/29/14.	2017, 5 TT violations, 422 M/R violations, and 1
				other violation were reported to SDWIS/Fed.
		Andrea Porter	Region 5 Assistance	
		porter.andrea@epa.gov;	R5 is reviewing the GWR	Ohio EPA 2016 EOY: GWR SOP is final. Significant
		(312) 886-4427	application. R5 submitted	deficiency procedure is drafted but will need to be
			questions on 8/16/16, and	updated with revisions adopted with RTCR which
		Joe Janczy	the state responded on	will align significant deficiencies under RTCR, GWR
		janczy.joseph@epa.gov;	10/31/16.	and SWTR.
		(608) 267-2763		
4 – NO ₂ /	primacy	Ohio EPA	Federal Expectations	<u>Discrepancies</u>
NO ₃		Todd Kelleher	See the federal expectations	None.
		todd.kelleher@epa.ohio.g	file.	
		ov; (614) 644-2752		Milestones
			State Commitment	None.
			Complete.	
				Ohio EPA 2016 EOY: New penalty program for
			Region 5 Assistance	failure to monitor for total coliform and nitrate
				developed and began implementation 1/1/14.
5 – LCR	LCR, LCRMR,	Ohio EPA	<u>Federal Expectations</u>	<u>Discrepancies</u>
	and LCRSTR:	Janet Barth	See the federal expectations	None.
	primacy	janet.barth@epa.ohio.gov	file.	
		; (740) 380-5250		<u>Milestones</u>
			State Commitment	
		U.S. EPA Region 5		

RULE	LEGAL STATUS	TECHNICAL CONTACTS	EXPECTATIONS	EVALUATION
		Miguel Del Toral deltoral.miguel@epa.gov; (312) 886-5253	Complete. States to provide comments on the proposed LCR long-term revisions (LCRLTR), as appropriate. Region 5 Assistance The LCR LTR proposed rule date is TBD. R5 will provide training on the proposal, including a summary of EPA's specific requests for comment and guidance on submitting comments to EPA. R5 will request information about state and PWS lead action level exceedance follow-up activities semi-	Ohio is reporting LCRSTR violations. As of January 2017, 577 M/R violations were reported to SDWIS/Fed. Ohio EPA 2016 EOY: Lead and copper SOP is final. In FY 2016, Ohio began drafting lead and copper regulations to meet the requirements of H.B. 512. Began implementing state specific requirements for lead and copper reporting required by H.B. 512 in September 2016.
6 – D/DBPRs	Stage 1: primacy Stage 2: interim primacy; application under review	Ohio EPA Todd Kelleher todd.kelleher@epa.ohio.g ov; (614) 644-2752 U.S. EPA Region 5 Mostafa Noureldin noureldin.mostafa@epa. gov; (312) 353-4735	annually. Federal Expectations In addition to the other D/DBPR requirements, electronically report all MCL, M/R TT and PN violations and inventory updates to SDWIS/Fed for all public water systems, including operator certification treatment technique violations per 141.130(c). See also the federal expectations file. State Commitment	Discrepancies Yes, acknowledged (regarding reporting type 12 violations for failure to have a certified operator as required by Stage 1). Ohio does issue violations for failure to have an operator, but they are not DBP TT violations. Ohio EPA needs to ensure that disinfectant residual running annual average (RAA) values are calculated and reported. Ohio EPA has a report to determine RAA to ensure the maximum residual disinfectant level (MRDL) is not exceeded, but Ohio EPA is not recording the results of this report, because daily chlorine residual are reported on monthly operating reports (MORs). Ohio EPA is more concerned about results below the minimum requirements than above the MRDL, which is based on a RAA. Ohio rarely sees results above the MRDL in single samples, much less as a yearly

RULE	LEGAL STATUS	TECHNICAL CONTACTS	EXPECTATIONS	EVALUATION
			Complete. Ohio submitted the Stage 2 primacy application on 1/18/13 and the AG certification on 7/29/14. Region 5 Assistance R5 is reviewing the Stage 2 application.	average. If Ohio sees results above the MRDL on results reported with RTCR samples or on MORs, Ohio will run the report to ensure that the MRDL has not been exceeded on a RAA basis. Further, the state wouldn't wait for the RAA calculation to exceed the limit to take action. Milestones The AG certification for the Stage 2 primacy application was received on 7/29/14. Ohio is reporting Stage 2 violations. As of January 2017, the following violations were reported to SDWIS/Fed: 233 MCL and 460 M/R violations. Ohio EPA 2016 EOY: MCL violations under Stage 2 monitoring have begun to be reported and are being addressed, including through enforcement actions where necessary. Chem/rad SOP revised to incorporate Stage 2 revisions.
7 – IOCs	primacy, except for the new arsenic rule arsenic rule: interim primacy; application under review	Ohio EPA Todd Kelleher todd.kelleher@epa.ohio.g ov (614) 644-2752 U.S. EPA Region 5 Miguel Del Toral deltoral.miguel@epa.gov; (312) 886-5253 As: Kim Harris harris.kimberly@epa.gov; (312) 886-4239	Federal Expectations See the federal expectations file. State Commitment Complete. Ohio EPA submitted a second addendum to the 2007 primacy application for the arsenic rule (related to corrections made by 8/1/10) on 10/26/12 per Region 5's request, and R5 received the AG certification on 8/6/14. Region 5 Assistance	<u>Milestones</u> As of January 2017, 5 systems (out of 4,561) had arsenic MCLs that were not RTC'd, including 2 CWSs (out of 1,209) and 3 NTNCWSs (out of 669).

RULE	LEGAL STATUS	TECHNICAL CONTACTS	EXPECTATIONS	EVALUATION
			R5 is reviewing the arsenic	
			application. R5 submitted	
			questions on the arsenic rule	
			on 9/1/16, and the state	
			responded on 10/31/16.	
8 – Radio -	primacy	Ohio EPA	Federal Expectations	<u>Discrepancies</u>
nuclides		Todd Kelleher	See the federal expectations	None.
		todd.kelleher@epa.ohio.g	file.	
		ov; (614) 644-2752		<u>Milestones</u>
			State Commitment	
		U.S. EPA Region 5	Complete.	
		Miguel Del Toral		
		deltoral.miguel@epa.gov;	Region 5 Assistance	
		(312) 886-5253		
9 – SOCs	primacy	Ohio EPA	Federal Expectations	<u>Discrepancies</u>
		Todd Kelleher	See the federal expectations	None.
		todd.kelleher@epa.ohio.g	file.	
		ov; (614) 644-2752		Milestones
			State Commitment	None.
		U.S. EPA Region 5	Complete.	
		Miguel Del Toral		
		deltoral.miguel@epa.gov;	Region 5 Assistance	
		(312) 886-5253		
10 – VOCs	primacy	Ohio EPA	Federal Expectations	<u>Discrepancies</u>
		Todd Kelleher	See the federal expectations	None.
		todd.kelleher@epa.ohio.g	file.	
		ov; (614) 644-2752		Milestones
			State Commitment	None.
		U.S. EPA Region 5	Complete.	
		Miguel Del Toral		
		deltoral.miguel@epa.gov;	Region 5 Assistance	
		(312) 886-5253		
11 -	N/A	Ohio EPA	Federal Expectations	Discrepancies
Sodium			See the federal expectations	None. Ohio EPA is not implementing this rule.
			file.	There is not a federal MCL or requirement to

October 1, 2015 through September 30, 2016

RULE LEGA	AL STATUS	TECHNICAL CONTACTS	EXPECTATIONS	EVALUATION
		Justin Burke Justin.Burke@epa.ohio.go v; (614) 644-2760 U.S. EPA Region 5 Miguel Del Toral deltoral.miguel@epa.gov; (312) 886-5253	State Commitment Complete. Region 5 Assistance	perform sodium monitoring. Ohio would have to adopt rules more stringent than the federal rules to require sampling. Ohio doesn't intend to adopt rules for sodium. Sodium is required for new well approval. Ohio references the federal guidance level of 20 mg/L in letters regarding new well results. Milestones
12 – PN prim	nacy	Ohio EPA Justin Burke Justin.Burke@epa.ohio.go v; (614) 644-2760 U.S. EPA Region 5 Kristina Bell bell.kristina@epa.gov; (312) 886-7489	Federal Expectations See the federal expectations file. State Commitment Partial. Region 5 Assistance	Discrepancies Yes, acknowledged (regarding not reporting PN tier 2 and tier 3 violations). The state has primacy for implementing the National Primary Drinking Water Regulations and is expected to fully implement all aspects of its safe drinking water statutes and rules on which primacy is based. If the state is unable to implement any portion of such a statute or rule, or otherwise comply with the federal implementation regulations, the state must submit a plan describing the steps the state will take to achieve full implementation and a schedule for doing so. This plan and schedule must be submitted within 90 days of the award of the FY17 grant. See Ohio EPA's plan and schedule for fully implementing the Public Notice (PN) Rule dated November 4, 2016. Milestones Ohio EPA aiready reports Tier 1 PN violations. Ohio EPA will begin issuing PN violations for all other violations except Tier 2 and Tier 3 RTCR and SWTR violations. PN violations are being issued for all compliance programs performed in central office. Information regarding violations that

RULE	LEGAL STATUS	TECHNICAL CONTACTS	EXPECTATIONS	EVALUATION
RULE 13 – CCR	primacy	Ohio EPA Justin Burke Justin.Burke@epa.ohio.go v; (614) 644-2760 U.S. EPA Region 5 Janet Kuefler kuefler.janet@epa.gov; (312) 886-0123	Federal Expectations See the federal expectations file. State Commitment Partial. Region 5 Assistance A memorandum signed on January 3, 2013, clarifies electronic delivery options for consumer confidence	require Tier 2 PN is also available to the public on Ohio's advisory tracker website. In program year 2018, Ohio EPA will work with the district offices to develop a similar program for RTCR and SWTR Tier 2 and 3 violations. Discrepancies Yes, acknowledged (related to reviewing CCR content and reporting violations). The state has primacy for implementing the National Primary Drinking Water Regulations and is expected to fully implement all aspects of its safe drinking water statutes and rules on which primacy is based. If the state is unable to implement any portion of such a statute or rule, or otherwise comply with the federal implementation regulations, the state must submit a plan describing the steps the state will take to achieve full implementation and a schedule for doing so. This plan and schedule must be
14 – UCMR4	Non-primacy	Ohio EPA Emilie Eskridge	Ohio EPA does not need to participate in UCMR4 activity as part of its primacy	for doing so. This plan and schedule must be submitted within 90 days of the award of the FY17 grant. See Ohio EPA's plan and schedule for fully implementing the Consumer Confidence Rule (CCR) dated November 4, 2016. Milestones Ohio EPA currently generates state violations for content violations for specific CCRs based on priority targeting criteria. Ohio EPA does not currently report content violations to R5, but can share the state violations with Region 5. Ohio EPA will report CCR content violations to R5 for the 2017 CCRs, provided R5 provides guidance on what content deficiencies trigger a federal violation. R5 provided guidance on 11/22/16. Ohio EPA signed the UCMR4 PA on 11/7/16. Due to resource constraints, Ohio elected to provide limited assistance and as such, agreed to support

RULE	LEGAL STATUS	TECHNICAL CONTACTS	EXPECTATIONS	EVALUATION
		Emilie.Eskridge@ohio.epa.	responsibilities. Ohio EPA has	three out of nine implementation activities. The
		gov	the option of participating in	state completed the first task (reviewing the draft
		(614) 644-2765	UCMR implementation and is	state monitoring plans) well ahead of the due date.
			encouraged to do so. The	
		U.S. EPA Region 5	specific partnership	
		Kim Harris	agreement (PA)	
		Harris.Kimberly@epa.gov	responsibilities that a state	
		(312) 886-4239	can adopt are reflected in the	
			PA.	

FY2016	Ohio EPA PWSS Program Sanitary Survey End-of-Year Summary
	October 1, 2015 through September 30, 2016
	Federal funding used: PWSS grant
State Contact	Andy Barienbrock
	andrew.barienbrock@epa.ohio.gov
	(614) 728-1216
EPA Region 5 Contact	Mostafa Noureldin, noureldin.mostafa@epa.gov, (312) 353-4735
Expectations	Ohio EPA will maintain a baseline core of individuals with the technical expertise needed to perform sanitary surveys.
	Ohio EPA will ensure sanitary surveys are conducted periodically that, at a minimum, meet frequency requirements specified by rule.
	Ohio EPA will ensure that sanitary surveys include an evaluation of the: (1) source; (2) treatment; (3) distribution system; (4) finished water storage; (5) pumps, pump facilities, and controls; (6) monitoring, reporting, and data verification; (7) system management and operation; and (8) operator compliance with state requirements.
	Ensure the appropriateness of the monitoring schedules for ground water systems serving ≤ 1,000 during each sanitary survey.
	See also the federal expectations file.
Region 5	Track state commitments under measure SDWA-01a and update Ohio
Assistance	EPA quarterly, engaging in discussion with states on progress as needed.
	R5 is available to facilitate sanitary survey training for states, as requested.
	EPA encourages state surveyors and inspectors to recommend the following activities to PWS managers during sanitary surveys, because these activities can help in building the capacity and long-term independence of PWSs:
	 Asset management programs; Energy efficiency programs; Water loss monitoring/mitigation programs; Succession planning; Source water protection and climate change adaptations; and Other involvement or roles in the local community.
	As requested, EPA can help promote training about these topics and provide outreach information, as well as updates and guidance materials, about these types of activities.
Discrepancies	None.
Milestones	None.
	I .

Self-Assessment and Evaluation

Tracking responses to sanitary surveys—some district offices use a separate survey schedule tracker and other district offices have individual inspectors tracking. Ohio EPA is in the process of deploying (SWIFT) to assist in uploading data to SDWIS. Once SWIFT is implemented, notices of violations and responses to sanitary surveys will be tracked in SDWIS.

National water program measure SDW-01a:

SURFACE AND GROUND WATER SYSTEMS: As of July 2016, 98.4% (1,189 out of 1,208) of the sanitary surveys at CWSs were completed between CY2013 and CY2015. States have until March 2017 to report CY2016 sanitary survey data for this national measure.

Sanitary survey completeness high priority query:

SURFACE WATER SYSTEMS: As of December 2016, 90.75% of the surface water CWSs (275 out of 303) completed sanitary surveys between CY2014 and CY2016. In addition, 95% of the surface water non-transient, non-community water systems (NTNCWSs) (18) and 100% of the transient, non-community water systems (TNCWSs) (9) have completed sanitary surveys between CY2012 and CY2016.

<u>GROUND WATER SYSTEMS</u>: As of December 2016, 100% of the ground water CWSs (936 out of 934) completed sanitary surveys between CY2014 and CY2016. In addition, 100% of the ground water NTNCWSs (744 out of 649) and 100% of the ground water TNCWSs (2955 out of 2675) have completed sanitary surveys between CY2012 and CY2016.

Ohio EPA is commended for continuing to make significant investments in sanitary surveys, a core aspect of the drinking water program.

Ohio EPA 2016 EOY: Surveys conducted during FFY 2016 met the eight survey components. During FFY 2016, Ohio conducted a total of 1,101 sanitary surveys; 397 at CWSs, 171 at NTNCWSs, and 533 at TNCWSs, including 88 at surface water systems.

Ohio EPA's sanitary survey workgroup has:

- revisited the survey requirements identified through the survey question set and revised as needed;
- provided guidance on how to identify these violations;
- made recommendations on how to ensure consistency;
- developed a method to prioritize unaddressed requirements for escalated enforcement; and
- incorporate capability assessments into the sanitary survey process when determining the cause of violations.
- The group is working to ensure requirements are identified and tracked consistently as described above with using the SWIFT program to assist in creating tracking schedules.

3. FY2016 OHIO EPA PWSS PROGRAM SANITARY SURVEY END-OF-YEAR SUMMARY

The workgroup reviewed and revised the survey question set. The revised survey question set has been incorporated into SWIFT.

The workgroup developed a prioritization scale for unaddressed survey requirements and significant deficiencies. The scale is based on a High, Medium and Low severity and has associated action items based on the severity of the unaddressed significant deficiency or survey requirement.

The capability screening tool has been incorporated into the prioritization scale for unaddressed survey requirements/significant deficiencies. The sanitary survey manual has been updated to reflect current triggers for the capability screening tool (SRF funds, etc.) and the sanitary survey manual will be updated as needed in the future to include additional triggers. Once the SWIFT pilot is completed, the manual will be updated as needed to incorporate changes identified during the pilot.

Ohio EPA continued to implement field and desktop audits of sanitary surveys for surveys completed after July 1, 2015. The audits are being conducted to ensure consistency statewide. The review includes clarity of the letter, format, records management and compliance with state and federal laws. Ohio EPA holds semi-annual Inspector Forums designed to bring all district office inspectors together for a day of discussion, sharing experiences and gaining knowledge on preselected topics of interest. The goal of the forums is to increase collective knowledge and statewide consistency for the sanitary survey process.

References

Ohio EPA's capability assurance evaluation form (10/08), which is used during sanitary surveys.

Ohio EPA's sanitary survey form.

Ohio EPA's sanitary survey manual. Significant deficiency guidance will not be completed until revisions for RTCR and SWIFT implementation are completed.

See also Ohio's sanitary survey guidance for small systems.

FY2016	6 Ohio EPA PWSS Program Laboratory Certification End-of-Year Summary
	October 1, 2015 through September 30, 2016
State Contact	Federal funding used: PWSS grant Steve Roberts
State Contact	Ohio EPA Division of Environmental Services (DES) Laboratory Certification Section Steve.Roberts@epa.ohio.gov (614) 644-4225
EPA Region 5	Frank Lagunas, Laboratory Certification Program Manager
Contact	lagunas.frank@epa.gov (312) 886-4466
Expectations	In order to maintain primacy, the states must comply with 40 CFR 142.10, which includes the following provisions: 142.10(b)(3)(i) and 142.10(b)(4).
	All laboratories that produce results for compliance with SDWA are certified by the state to which those results are reported. These certifications shall be done at a frequency of at least once every three years and will meet all requirements of 40 C.F.R. parts 141 and 142.
	EPA recommends that states have a process for ensuring capacity to analyze at the principal state lab or commercial labs all National Primary Drinking Water Regulations (NPDWR) parameters that are required to be sampled in the state.
	See also the federal expectations file.
Region 5 Assistance	R5 expects to conduct lab audits and program reviews in Ohio in FY 2017.
	The last audit of the Ohio EPA principal state lab (PSL) occurred during December 2013. Findings and certification decisions are mentioned in the references section below. The PSL has passed the required proficiency testing (PT) for all the parameters that were last certified by U.S. EPA.
	The PSL is not certified for the following NPDWR contaminants: radionuclides, dioxin, carbofuran, diquat, endothall, oxamyl, and glyphosate and also a number of IOCs and SOCs (antimony, arsenic, barium, beryllium, cadmium, chromium, copper, lead, selenium, thallium, alachlor, atrazine, PAHs, di(2-ethylhexyl)adipate, di(w-ethylhexyl)phthalate, endrin, heptachlor, heptachlor epoxide, hexachlorobenzene, hexachlorocyclopentadiene, lindane, methoxchlor, PCBs, simazine, and toxaphene). MOUs with commercial labs in the state (i.e., Alloway, Summit and Brookside) have been established for analysis of the contaminants for which the PSL is not certified. In addition, the state has designated the Wisconsin State Lab of Hygiene, Underwriters Laboratories Inc., and Summit Environmental Technologies Inc. as acceptable laboratories for radiochemistry analysis. Ohio also uses the State of New York as a third-party assessor for asbestos.
	Ohio maintains a list of accepted cryptosporidium laboratories on its Certified Laboratories webpage. The record is updated quarterly. Ohio is currently certifying out-of-state labs that have National Environmental Laboratory Accreditation Conference (NELAC) certification for <i>Cryptosporidium</i> .

4. FY2016 OHIO EPA PWSS PROGRAM LABORATORY CERTIFICATION END-OF-YEAR SUMMARY

Discrepancies	None.
Milestones	None.
Self-Assessment and Evaluation	The Ohio EPA certification program is managed by their state lab. According to the 2016 annual Region 5 laboratory certification program assessment, Ohio doesn't anticipate any laboratory capacity issues for any of the regulated drinking water contaminants or any resource issues.
	Ohio EPA 2016 EOY: In FFY 2016 laboratory certification staff performed 360 onsite visits. During 2015, Ohio EPA certified 329 chemistry labs, 161 microbiology labs, 3 radiochemistry labs, and 7 cryptosporidium labs. Ohio EPA has been able to stay on schedule with triennial onsite audits of all certified laboratories. During 2015, they conducted 267 chemistry labs, 116 microbiology labs, and 1 radiochemistry lab within the state. No labs were downgraded from full certification.
	The laboratory continues to analyze samples for public water systems for cyanotoxins. Ohio EPA worked with U.S. EPA/ORD, PWSs, and other experts to develop an SOP for sample handling and analysis of Total (Extracellular and Intracellular) Microcystins - ADDA by ELISA Analytical Methodology, which was finalized in January 2015. In June 2016, the lab began screening PWSs for cyanobacteria via qPCR. In June 2017, Ohio EPA will begin certifying labs for microcystin analysis and cyanobacteria screening.
	Ohio EPA has incorporated a newly adopted Laboratory Certification Program (LCP) database (DESLITS) to track proficiency testing (PT) sample unacceptable results more efficiently.
References	 R5 audit findings report (April 1, 2014) R5 certification letter (January 22, 2015) Laboratory certification program annual questionnaires (2016) Memo from the R5 Water Division to EPA's Office of Ground Water and Drinking Water re. SOC monitoring trigger levels (November 2010) Ohio EPA's certified laboratories website: http://epa.ohio.gov/ddagw/labcert.aspx

FY2016 Ohio EPA I	PWSS Program Enforcement and Compliance Assistance End-of-Year Summary
	October 1, 2015 through September 30, 2016
	Federal funding used: PWSS grant, DWSRF PWSS set-aside
State Contact	Name: Justin Burke
	Email: justin.burke@epa.ohio.gov
	Telephone Number: (614) 644-2760
EPA Region 5	Name: Dorothy Wormbly
Contact	Email: wormbly.dorothy@epa.gov
	Telephone Number: (312) 886-9736
Expectations	Evaluate compliance with all rules, and respond to violations by providing
	compliance assistance or enforcement as appropriate. Keep adequate records
	of pertinent state decisions. EPA R5 continues to look to states to refer
	noncompliant PWS.
	See also the federal expectations file.
Region 5	Each quarter, send Ohio EPA the latest Enforcement Targeting Tool (ETT) data
Assistance	along with a request for referrals and updates on priority systems. EPA R5
	integrates these updates into reports before the next request is sent out. EPA
	R5 will request information about state and PWS lead action level exceedance
	follow-up activities semi-annually.
	Assist with referrals, enhanced data exchange, analysis, data clean-up, or other
	joint efforts as requested by Ohio EPA.
	Joint enorts as requested by Office LFA.
	Track state commitments under measure SDWA02 and update Ohio EPA
	quarterly, engaging in discussion with states on progress as needed.
Discrepancies	Yes, acknowledged (i.e., PN and CCR). The state has primacy for implementing
•	the National Primary Drinking Water Regulations and is expected to fully
	implement all aspects of its safe drinking water statutes and rules on which
	primacy is based. If the state is unable to implement any portion of such a
	statute or rule, or otherwise comply with the federal implementation
	regulations, the state must submit a plan describing the steps the state will
	take to achieve full implementation and a schedule for doing so. This plan and
	schedule must be submitted within 90 days of the award of the FY17 grant. See
	Ohio EPA's plan and schedule for fully implementing PN and CCR dated
	November 4, 2016.
Milestones	Each quarter, Ohio EPA updates SDWIS/FED with state enforcement data.
	Annually, by July 1, prepare and submit an ACR.
	Ohio enforcement strategy is current and relevant and if not, plans to update it.
	one characteristrategy is current and relevant and it not, plans to apaate it.
	Ohio EPA's 2016 ETT commitment was to address or resolve 32 systems. Ohio
	EPA's FFY 2016 end-of-year results show that Ohio EPA had addressed 74
	systems (25 from the original 32 on the July 2015 fixed base list plus an

5. FY2016 OHIO EPA PWSS PROGRAM ENFORCEMENT AND COMPLIANCE ASSISTANCE END-OF-YEAR

	additional 49 that had become priority systems after July 2015). Ohio EPA is commended for this accomplishment in well exceeding its 2016 commitment. Ohio EPA uses the ETT list to address systems with a score equal to or greater than 11 and is moving to address systems before reaching a score of 11. Ohio EPA utilizes an annual compliance review developed in FFY 2015 to identify and prioritize public water systems having a pattern of non-compliance not identified by the ETT score and is adjusting current programs to identify, prioritize, and respond more quickly to non-compliant systems and PWSs with
Self-Assessment	lead action level exceedances prior to reaching a score of 11 on the ETT. Ohio EPA uses the ability to condition a license to operate in addition to
and Evaluation	traditional enforcement actions, such as bilateral compliance agreements and findings and orders. In FFY 2016, Ohio EPA implemented the expedited settlement agreement program to send 187 warning letters, issue 42 Streamlined Orders, and 14 Administrative Orders. For the second consecutive year, according to Ohio EPA's data, Ohio EPA has met shared goal 7 (less than 10 percent of TNCWSs with significant/major monitoring violations) in FFY 2016. R5 recognizes this accomplishment.
	EPA R5 maintains a direct enforcement role in our states and continues to pursue with Ohio EPA how to most effectively coordinate those efforts. In particular, EPA R5 continues to look to states to refer noncompliant PWS. Ohio EPA posts lists of potential violators, and they now have noncompliance documents since January 1, 2007, available online via their <u>public records</u> website through an eDocument Search. Eventually, electronic copies of most of the agency's public records will be available.
References	Ohio EPA's Annual Compliance Report (2016) Joint file review and enforcement verification report for Ohio EPA DDAGW (June 2015)

FY2016 O	hio EPA PWSS Program Data Management a	and Reporting End-of-Year Summary
	October 1, 2015 through Septe	
	Federal funding used: PW	'SS grant
State Contact	Name: Tab Brewster	
	Email: Thomas.brewster@epa.ohio.gov	
	Telephone Number: (614) 644-2764	
EPA Region 5	Name: Kris Werbach (SDWIS/Fed	Name: Andrea Porter (high priority
Contact	reporting)	queries)
	Email: werbach.kristine@epa.gov	Email: porter.andrea@epa.gov
	Telephone Number: (312) 886-6527	Telephone Number: (312) 886-4427
	Name: Wendy Drake (data verifications,	Name:
	program/file reviews)	Email:
	Email: drake.wendy@epa.gov	Telephone Number:
	Telephone Number: (312) 886-6705	
Expectations	Ohio will maintain a database that tracks p	
	and violations for all federal rules. Ohio wi	•
	FedRep as new releases are made, conduc	t timely reporting on a quarterly basis to
	Region 5 (FFYQ1 – February 15, FFYQ2 – M	ay 15, FFYQ3 – August 15, and FFYQ4 –
	November 15), and correct any reporting e	· · · · · · · · · · · · · · · · · · ·
	report to EPA actions and sample data qua	•
	in accordance with 40 CFR 142.15. These d	•
	utilize the Central Data Exchange (CDX) as	the media for data transfer to U.S. EPA.
	States should continue planning SDWIS Pri	me transition schedules and activities in
	FY17, if applicable. States will keep Region	
	plans, if applicable.	
	promote approximation	
	States include the anticipated target date f	for using SDWIS Prime here: Ohio EPA has
	not set a date to move to Prime.	
	States should continue to improve invento	ry reporting to SDWIS/FED, focusing
	primarily on inventory data quality errors a	and improving locational data for CWS and
	NTNCWS intakes, wells, and other source f	acility types, as well as treatment plants,
	for regional emergency response needs. St	ates are encouraged to report locational
	data for TNCWS, too, but this is not a requ	irement.
	See the expectations file for additional info	ormation.
Region 5	- R5 expects that compliance determina	tion and violation reporting tool (CDVRT)
Assistance	training will be conducted when the CI	DVRT modules are completed (TBD).
	- Region 5 will assist states with resolving	g data quality issues, as appropriate and
	resources allow.	
	- R5 will notify states of any inventory re	equirement changes when they are
	documented by EPA headquarters.	
Discrepancies	Yes, there are acknowledged discrepancies	s (e.g., PN and CCR). The state has primacy
	for implementing the National Primary Dri	nking Water Regulations and is expected
	to fully implement all aspects of its safe dr	inking water statutes and rules on which
	primacy is based. If the state is unable to in	mplement any portion of such a statute or
	rule, or otherwise comply with the federal	implementation regulations, the state

6. FY2016 OHIO EPA PWSS PROGRAM DATA MANAGEMENT AND REPORTING END-OF-YEAR SUMMARY must submit a plan describing the steps the state will take to achieve full

	must submit a plan describing the steps the state will take to achieve full
	implementation and a schedule for doing so. This plan and schedule must be
	submitted within 90 days of the award of the FY17 grant. See Ohio EPA's 's plan and
	schedule for fully implementing PN and CCR dated November 4, 2016.
Milestones	R5 requests that states copy the region when responding to the annual headquarters survey asking about which states are using various SDWIS/State components.
	Ohio EPA is using SDWIS/State 3.33 and FedRep 3.51 to report to SDWIS/Fed ODS.
	Ohio EPA 2016 EOY: SOPS are drafted or being drafted for some SDWIS components, such as Chem/Rad, TCR, GWR and some of Lead and Copper related to SOX'ing and RTC'ing violations and significant deficiencies. The TCR SOP is complete; an RTCR SOP is being developed. The Chem/Rad SOP is under revision to incorporate Stage 2. The GWR SOP, and Rescind/RTC SOP are complete. DDAGW worked on the SOP for significant deficiencies through FFY 2013, but will need to update it with revisions adopted with RTCR, which will align significant deficiencies under RTCR, GWR and SWTR. The Lead and Copper SOP will be revised in FFY 2017 after rule revisions are adopted.
	Ohio EPA applied for and received the National Environmental Information Exchange Network (NEIEN) 2013 grant to make Drinking Water Watch (DWW) available to external customers. Ohio will be making DWW public once SDWIS Prime is completed and web services are available for DWW to consume the data. Also included in the NEIEN grant was the installation of Windsor Solutions' Site Profiler web application. Site Profiler will also publish SDWIS data out to the web along with other environmental program data in a GIS interface. Included in this will be links to Ohio's electronic document management system, allowing the public to retrieve and view non-compliance and other regulatory documents. SDWIS data has been migrated to the Windsor Solutions' Site Profiler web application. It is expected to be available to the public by April 2016 once some connectivity issues are fixed. Ohio EPA's Site Profiler was made available to the public in September of 2016.
	In preparation for moving to SDWIS Prime, Ohio has begun inventorying all of the applications that consume SDWIS data and evaluating the level of effort needed to re-connect to SDWIS Prime once available. In addition, Ohio EPA has purchased from GEC the Safe Water Information Field Tool (SWIFT) to replace the Electric Sanitary Survey (ESS) currently used by field staff. SWIFT will be hosted in the GEC cloud environment. Staff will access SWIFT using tablets with a data plan. This will allow staff to have real time access to SDWIS data during the survey. For surveys where access to a cellular signal is limited or not available, there will be an off-line application available where the survey can be downloaded prior to going out in the field. Work completed so far includes: migration of the question set, purchasing of iPads for pilot testing, hosting environment setup, and connectivity between SDWIS and SWIFT. Ohio EPA is still working on getting SWIFT into production. The planned piloting date is now July 2017.
Self-	Ohio continues to meet the quarterly deadlines for reporting data to the national
Assessment	database, SDWIS/Fed-ODS, and is making corrections to identified data quality errors
and	in a timely manner.
Evaluation	
LValuation	

6. FY2016 OHIO EPA PWSS PROGRAM DATA MANAGEMENT AND REPORTING END-OF-YEAR SUMMARY

	Ohio EPA posts lists of potential violators, and they now have noncompliance documents since January 1, 2007, available online via their <u>public records</u> website through an eDocument Search. Eventually, electronic copies of most of the agency's public records will be available.
References	Joint file review and enforcement verification report for Ohio EPA DDAGW (June 2015) Ohio's FY16 measures and indicators summary

FY2016 Ohio EPA PWSS Program Operator Certification End-of-Year Summary		
October 1, 2015 through September 30, 2016		
Federal funding used: PWSS grant		
State Contact	Andy Barienbrock	
	andrew.barienbrock@epa.ohio.gov	
	(614) 728-1216	
EPA Region 5	Jennifer Crooks	Valerie Bosscher
Contacts	crooks.jennifer@epa.gov	bosscher.valerie@epa.gov
	(312) 886-0244	(312) 886-6731
Expectations	States establish and maintain minimum	•
	operation and maintenance of all public	
	trained and certified professionals are o	_
	distribution of safe drinking water and to promote compliance.	
	Provide documentation to U.S. EPA show	wing the ongoing implementation of the
	program to avoid 20% withholding of th	e DWSRF grant. Annual reports must
	include operator certification reporting	
	comments from the previous year's approval letter.	
	For operators of CWSs and NTNCWSs: F	Provide training and certification
	opportunities for new operators and for operators upgrading and renewing	
	certification, including training to ensure sustainable water utilities and	
	supplies.	
	Participate in quarterly Operator Certific Region 5 staff and other Region 5 States	
	Participate in development/planning and attending the first annual Region 5	
	Operator Certification/Capacity Development workshop to be held at Region 5	
	in Chicago in FY 2017, February 7-8.	
	See also the federal expectations file.	
Region 5	As requested, Region 5 will provide train	•
Assistance	sustainable water utilities and supplies t	•
	providers, in coordination with the state	2.
	During FY 2017, Region 5 plans to re-eva	aluate the Region 5 States' Operator
	Certification Programs, to ensure the ni	
	outlined in EPA's Operator Certification	•
Discrepancies	None.	
Milestones	None.	
Self-Assessment	EPA approved Ohio's 2015 operator cer	tification program annual report and is
and Evaluation	reviewing Ohio's 2016 annual report. Ol	, -
	certification program complies with the	· · · · · · · · · · · · · · · · · · ·
		to recognize the importance of properly
	trained and certified operators in protection	cting public health.

Activities taken by Ohio EPA to ensure operators are appropriately certified include overseeing the certification of 5,893 drinking water operators with active certificates. Ohio EPA has achieved excellent compliance rates—all community and non-transient non-community systems have certified operators, with the exception of some small systems. During SFY 2016, 99 percent of classified facilities had operators who were properly certified. The compliance rate for transient non-community water systems is 98 percent in SFY 2016, up from 93 percent in SFY 2015. Ohio's effective enforcement process has contributed to the compliance rate. Ohio EPA is acknowledged for maintaining a consistent number of certified operators and for taking actions to encourage entrance into the water industry. Ohio instituted a new procedure with the annual inventory update for each PWS to ensure the database is up-todate. Ohio also began developing reports to ensure that monthly operating reports are submitted by one of the operators of record in the database. Ohio sends notices of violation to facilities when this information does not match. The number of enforcement actions taken by Ohio significantly increased between SFY 2015 and 2016.

Ohio EPA 2016 EOY: Ohio EPA continued to provide free web-based training for Class A operators. Ohio EPA continues to implement an e-application and payment system, which is now used for all operator exam applications and contact hour applications. Ohio EPA will be implementing new rules in FY 2017 that will require renewal applications and contact hour tracking for individual operators in the electronic system. DDAGW continued a new compliance program for systems without operators. If a PWS fails to address notices of violation, DDAGW proposes an expedited settlement agreement, which requires the system to hire an appropriately certified operator and pay a \$1,000 fine. During FY 2016, 899 operators took advantage of Ohio's third party examinations.

In addition to paper examinations provided twice per year, Ohio EPA is commended for providing on-demand computer-based examinations at five third-party testing location throughout the state.

Improvement suggestions for all states:

- Implement incentives and outreach to students, returning veterans and other groups, in order to ensure adequate number of certified operators and promote system compliance.
- Improve systems (such as websites and online database systems) for applications, continuing education, and certificate renewals, to remove barriers for operators to obtain or maintain certification.
- Evaluate options to increase the number of testing locations and/or exam date offerings, to remove barriers for new operators to obtain certification.
- Continue to ensure Asset Management is a strong focus during FY 2017.
- Ensure adequate RTCR questions on Operator Exams so Operators know how to conduct Level 1 assessments to satisfy RTCR requirements.

7. FY2016 OHIO EPA PWSS PROGRAM OPERATOR CERTIFICATION END-OF-YEAR SUMMARY

References	Ohio's operator certification annual report and approval letter (2015)	
	Ohio FDA cortified energters websites	
	Ohio EPA certified operators website:	
	http://www.epa.ohio.gov/ddagw/opcert.aspx	

FY2016 Ohio EPA PWSS Program Capacity Development End-of-Year Summary	
- 1 16 11	October 1, 2015 through September 30, 2016
Federal funding use	ed: PWSS grant, small systems technical assistance, PWSS, and local assistance and
	other state programs set-asides
State Contact	Susan Schell
	susan.schell@epa.ohio.gov
	(614) 752-9725
EPA Region 5	Sahba Rouhani
Contact	rouhani.sahba@epa.gov
	(312) 886-0245
Expectations	Ohio EPA ensures that new and existing CWSs/NTNCWSs can demonstrate technical, managerial, and financial capacity to operate in compliance with federal and state regulations. Ohio EPA's Division of Environmental and Financial Assistance (DEFA) provides a report to R5 annually, by September 30 th each year, showing the ongoing implementation of both the new systems program and the existing systems strategy to avoid 20% withholding of the DWSRF capitalization grant. The report should address the capacity development reporting measures. Ohio commits to respond to comments from previous year's approval letter.
	Every three years, submit a report to the governor and provide a copy to R5 on the efficacy of the strategy and the progress made toward improving the capacity of water systems in Ohio. The report to the governor is due October 1, 2017. Participate in quarterly Operator Certification/Capacity Development calls with R5 staff and other Region 5 States.
	Participate in development/planning and attending the first annual R5 Operator Certification/Capacity Development workshop to be held at R5 in Chicago in FY 2017; February 7-8. See also the federal expectations file.
Region 5	R5 will send a reminder to Ohio EPA about the capacity development annual
Assistance	report in August, annually.
	R5 will send a reminder to Ohio about the report to the governor in August 2017. As requested, the R5 sustainable water infrastructure (SWI) workgroup will provide training and outreach materials to water system operators and technical assistance providers, in coordination with Ohio, to promote SWI activities including those related to water and/or energy efficiency, asset management, and climate change adaptation and mitigation activities. SWI is important to the
	success of other PWSS program activities, including source water protection, DWSRF, operator certification, and all-hazards resilience approaches. In the recent past, R5 has received requests from headquarters for recommendations regarding communities to consider for pilot projects involving technical

	assistance to build resiliency, such as through the Climate Resilience Evaluation
	and Awareness Tool (CREAT) risk assessment application, which helps utilities in
	adapting to extreme weather events, the Water Finance Center, as well as other
	community initiatives. R5 encourages states to let the region know of any
D '	communities who might be interested in future projects.
Discrepancies	None.
Milestones	Annually provide documentation to R5 showing the ongoing implementation of both the new systems program and the existing systems strategy. Due date: September 30 annually The next report to the governor is due October 1, 2017.
Self-Assessment	Ohio EPA 2016 EOY: Activities in program year 2016 taken by Ohio EPA to
and Evaluation	strengthen system capacity included drafting rules and legislation to require all public water systems to maintain a written asset management program. In FFY 2016, the workgroup implemented the capability screening tool for all systems applying for an SRF loan and other systems that appeared to lack capability. The screening tool identifies areas for improvement that need to be addressed in capability assurance plans. The capability screening tool was also incorporated into the prioritization scale for unaddressed sanitary survey requirements/significant deficiencies.
	Ohio EPA has a contract with Great Lakes Rural Community Assistance Program (RCAP) to provide training to local officials on asset management and maximizing system efficiency and sustainability with reduced resources. RCAP offered free, online training and classroom training available to the public in program year 2016. Ohio EPA also participates in sustainable infrastructure efforts of the Ohio Water Resources Council. RCAP continued an intensive technical assistance project in 2016 for systems lacking technical, managerial, and financial capacity.
	The Drinking Water Assistance Fund (DWAF) program includes incentives in the SRF point structure for effective management, such as utility board training, conservation, preventative maintenance, regionalization/consolidation, backflow prevention programs, contingency plans, endorsed protection plans, asset management plans, projects consistent with sustainable growth plans, etc. In addition, the DWAF disadvantaged community subsidy requires that recipients take the board training prior to the loan award.
	Ohio is commended for continuously improving its capability assurance program; forming a capability assurance workgroup; offering free, online training, such as utility management and asset management, to improve systems' capabilities and sustainability; and developing a capability screening tool that identifies and prioritizes system deficiencies and incorporates sustainability activities.
References	R5 approval letter (2016)
	 Ohio's capability assurance strategy annual report (2016)
	Ohio's capability assurance strategy triennial report to the governor
	(September 2014)

- Ohio EPA's small systems technical assistance set-aside report (2016) and U.S. EPA DWSRF set-aside review reports that document work conducted under the RCAP contract
- Ohio's capability assurance website: http://epa.ohio.gov/ddagw/financialassistance.aspx (see the capability assurance tab)
- Ohio's capability assurance program guidelines (October 1999):
 http://www.epa.ohio.gov/portals/28/Documents/dwaf/eng03.pdf
- Ohio EPA capability Assurance Plans for New Public Water Systems (November 2013) Fact Sheet:
 http://epa.ohio.gov/Portals/28/documents/dwaf/CAPfactsheetNewPWS.pdf

FY2016	Ohio EPA PWSS Program Source Water								
	October 1, 2015 through Sep								
Federal funding		ce and other state programs set-asides, and							
State Contacts	CWA Section 1 Jeff Patzke								
State Contacts	jeff.patzke@epa.ohio.gov	Barb Lubberger barbara.lubberger@epa.ohio.gov							
	(614) 644-3029	(614) 644-2863							
EPA Region 5	Cary McElhinney	Cary McElhinney							
Contacts	mcelhinney.cary@epa.gov	mcelhinney.cary@epa.gov							
Contacts	(312) 886-4313	(312) 886-4313							
Expectations		rce water protection (SWP) plans and the							
Expectations	1	measures (electronically via SDWIS, if							
		Consider ways to document and track SWP							
	implementation efforts in state data	•							
	implementation errores in state data	system.							
	SDW-SP4a: By FY2016 Ohio's target i	s to minimize risk to public health through							
	,	0 percent of CWSs (i.e., "minimized risk"							
	•	ion, as determined by the state, of actions in							
	a source water protection strategy).	ion, as accernined by the state, or actions in							
	a searce mater procession on accepy,								
	SDW-SP4b: By FY2016. Ohio's target	is to minimize risk to public health through							
	SDW-SP4b: By FY2016, Ohio's target is to minimize risk to public health through source water protection for at least 66 percent of the population served by CWSs.								
	source water protection for at least 66 percent of the population served by CWSS.								
	Annually report on SWP activities conducted with Drinking Water State Revolving								
	Fund (DWSRF) set-aside funding.								
	Update source water assessments, as	resources allow.							
	Continue to develop and everand SWI	nragram implementation mechanisms							
	Continue to develop and expand SWI	P program implementation mechanisms.							
	The next annual meeting will be in M	ichigan in 2017.							
	See also the federal expectations file.								
Program		using its SWP program survey results to							
successes and	1 -	nplementation. It will be issued again in							
challenges	•	106 funds to support an ambient ground							
		her projects (for example, see article in							
		ality monitoring newsletter, pages 4-5). See							
		tion" section below for more program							
	successes.								
	CHALLENGES OF A SAME	al also the state of the state							
	CHALLENGES: Ohio's SWP program is	•							
		ed to complete or update a SWP plan within							
		ew well construction. Several issues that Ohio							
	_	ntamination to wells from salt storage							
	•	P) areas (Ohio worked on developing salt							
		ar (SPY) 2012; see <u>draft</u> available from the							
	Unio Water Resources Council websit	te), as well as potential contamination from							

toxic algae blooms (see Ohio's HAB website for more information), geothermal wells, and hydraulic fracturing activities. Region 5 Encourage data sharing with other programs to prioritize permitting and Assistance compliance activities in source water areas, for example. Review state 303(d) and 305(b) reports (or integrated reports) to recommend SWP opportunities; continue to work with the Clean Water Act program (e.g., using the CWA/SDWA integration checklist and/or the online CWA/SDWA toolkit) to encourage the assessment of waters for drinking water use, as well as other collaborative initiatives. R5 continues to solicit proposals from states for SWP workshops. EPA continues to occasionally provide SWP brochures and webinars. See also the federal expectations file. **Self-Assessment** During FY17, the main outreach priority for Ohio's SWP program will be to and Evaluation encourage high-susceptibility municipal surface water PWSs, especially those considered vulnerable to HABs, to develop SWP plans. Ohio EPA reported SWP substantial implementation information met the FY16 commitments for the two SWP measures (SP4a and SP4b). Specifically, Ohio minimized risk to public health through SWP for 69% (846/1,217) of CWSs (2016 state target: 50%) and 87.8% (8,990,000/10,235,916) of the population served by CWSs (2016 state target: 66%), where "minimized risk" is achieved by substantial implementation, as determined by the state, of actions in a SWP strategy. Ohio is reporting these measures through SDWIS. Note: These end-of-year numbers were provided by Ohio. The "measures and indicators" summary includes the numbers that were submitted for national measures SP4A and SP4B, and the reason for the difference between the two sets of numbers is explained in that document. As of July 2016, there are a total of 846 substantially implementing CWSs, which includes CWSs that purchase water from systems that are substantially implementing protective strategies. In SPY 2016, Ohio completed 121 source water assessment reports and endorsed 6 of the 7 SWP plans developed by municipal PWSs that were received during SPY 2016. Ohio received and accepted checklist-style protection plans from 53 nonmunicipal systems in SPY 2016. In addition, Ohio is commended for reviewing and providing comments on district office workplans documenting SWP implementation; coordinating with the Farm Service Agency and the Ohio Rural Water Association in the development of local SWP plans; revising previous SWP area delineations; conducting SWP planning workshops for multiple municipalities; conducting analyses, site inspections, and investigations of salt storage facilities; and coordinating with ODNR and reviewing planned routes for new oil and gas pipelines and sharing findings with PWSs with SWP areas within or next to the proposed routes. References Ohio EPA's WHP set-aside reports and U.S. EPA DWSRF set-aside review reports document work conducted under the WHP set-aside

9. FY2016 OHIO EPA PWSS PROGRAM SOURCE WATER PROTECTION END-OF-YEAR SUMMARY

- Ohio's criteria for substantial implementation—Modified in 2015 to use triennial "SWAP surveys" as the primary basis for evaluating implementation status; copy attached below at end of this summary—the next survey will be issued in January 2018
- CWA Section 106 (ground water section) grant annual reports
- Ohio EPA SWP program fact sheet in the draft national SWP report (January 2012)
- Ohio's drinking water source protection newsletter updates (2011, 2012,2013, 2014, and 2015)
- Ohio's source water assessment and protection program website
- Ohio's ground water quality characterization program website

Criteria for "Substantial Implementation" of Source Water Protection Strategies in Ohio (Revised 2015)

"Initial" Strategy in Place and Implemented

Ohio's community and non-community public water systems are covered by strategies that have been implemented at the <u>state</u> level to protect sources of drinking water. The state has ensured that all water systems have source water assessment reports including a source water evaluation, potential contaminant source inventory, susceptibility analysis and recommendations for protection planning and identification of protective strategies. Source waters are protected through implementation of various state regulations including sanitary isolation radius for wells and a number of statewide environmental management and clean-up regulations. These environmental regulations provide additional provisions to protect source waters within source water protection areas or near wells and water supply intakes. Ohio's public water systems that use surface water sources are provided with additional protection under the State's public water supply beneficial use water quality standards within the vicinity of their intakes.

Using these criteria, 100% of Ohio's water systems are classified as having an "initial" source water protection strategy in place and implemented.

Substantial Implementation

Substantial implementation for public water systems is achieved if:

- The system uses ground water classified as low susceptibility to contamination or
- The system has achieved a score of at least 5 on the latest SWAP survey, which provides 1 point for each type of protective strategy being implemented or
- The system uses Lake Erie as a source of water and has been classified as an 'offshore system'*
 and is
 - --- issuing an adequate CCR annually and
 - ---has an adequate contingency plan that includes incorporation into an early warning network operated by the U.S. Coast Guard

Determining Substantial Implementation (2015 Process)

FOR U.S. EPA's PURPOSES:

Not implementing 0-4 strategies claimed on survey Implementing 5+ strategies claimed on survey

Starting in 2015, Ohio EPA began using an online "SWAP Survey" to evaluate the level of substantial implementation of local source water protection plans. The survey was first issued in 2007, and was improved and reissued as separate versions for municipal and non-municipal systems in 2011. Each time, 60-70% response was achieved. Databases and reports were developed to report on the findings, so that in 2015 Ohio's SWAP Program felt confident enough to move to this more accurate and straightforward process for reporting.

^{*}An 'offshore system' is one whose intake is located a significant distance from shore and has no adverse land-based water quality impacts. (Note: Harmful algal blooms are considered a land-based water quality impact.)

FY2016 OHIO EPA PWSS PROGRAM SOURCE WATER PROTECTION END-OF-YEAR SUMMARY

Previously, substantial implementation was based primarily on the number of systems that had endorsed local source water protection plans. However, many of these plans were created up to 25 years ago, and did not reflect current conditions; in some cases, the plans have not been implemented. Therefore, this metric was highly unsatisfactory for a program that, by its nature, depends on ongoing efforts. In addition, Ohio's process counted all low-susceptibility community systems as "implementing", though "naturally protected" would have been more accurate. Finally, there were other metrics for evaluating various types of surface water systems, and the total included systems that didn't have a protection plan, but were known to be implementing strategies. This combination took several pages to explain and was very unwieldy.

The 2015 process is based on a point system, as follows:

NOT implementing = 0-4 points

Implementing, but adequacy uncertain = Groundwater: 5-8 points

Surface water: 5-14 points

Significant Implementation = Groundwater 9-29 points

= Surface water 15-29 points

Exceptional Implementation = 30+ points

All systems, municipal and non-municipal, that responded to the survey and reported over four strategies are included in the 'substantially implementing' list provided to U.S. EPA. Non-responding systems are scored as a 0, i.e., not implementing.

In January 2015, all community public water systems were sent a letter inviting them to enter an Ohio EPA website and open their survey with a unique password provided in the letter. Non-municipal systems have a 2-page survey that focuses more on well maintenance and strategies that can be implemented within one's property boundaries. The municipal systems' surveys were considerably longer, addressed both ground water and surface water strategies, and included more community-based strategies such as zoning and cooperation with local environmental agencies and groups.

Ohio EPA proposes to issue the survey every three years, so the next survey will be in 2018. During 2015 to 2018, ground water staff will visit the systems and verify that the public water systems are responding appropriately to the survey. The numbers and percentages reported in 2016 and 2017 will vary from 2015's only to the extent that additional surveys are received or previously received 2015 surveys are changed based on the visit. Also, any public water system that receives endorsement of a source water protection plan will be considered "implementing" for the remainder of the triennium. During the next survey period, its status will be judged according to its survey.

Two problems with this process are: not everyone responds to the survey, and the process depends on self-reporting (though the accuracy and honesty for most of the systems is checked by ground water staff over the course of three years). Ohio's Source Water Protection Program will work to develop stronger reporting incentives over the next program year.

FY2016 Ohio EPA PWSS Program Measures and Indicators End-of-Year Summary October 1, 2015 through September 30, 2016

Ohio EPA contact: Beth Messer, beth.messer@epa.ohio.gov, (614) 644-2752

Region 5 contacts: Wendy Drake, drake.wendy@epa.gov, (312) 886-6705; and Andrea Porter, porter.andrea@epa.gov, (312) 886-4427

Note: An asterisk (*) indicates that a target was not met.

#	Description	Туре	Used for	Name and update schedule	File	Target	Applicable period (e.g., CY/FY)	End-of-year (EOY) results and comments
Offic	e of Water National Program Mea	sures				l	(8-)	
1	% of pop. served by CWS that receive DW that meet health-based standards	NPM/ GPRA	PWSS overall	SDW-2.1.1 (Updated quarterly by HQ—NPM Measures Tables filtered for active, non-RTC'd MCL violations)	National Program Manager (NPM) measures	FY11: 82% FY12: 95% FY13: 94% FY14: 94% FY15: 92% FY16: 92% FY17: 92%	FY ¹ (e.g., for FY15, the measure is calculated as of October 2015 for the period 7/1/14 to 6/30/15)	FY11 EOY: 96.9% (NOTE: Ohio had two large systems (Cleveland and Dayton) with new violations); FY11 4 th quarter: 96.6% FY12 EOY: 97.8% FY13 EOY: 98.4% FY14 EOY: 93.1%* FY15 EOY: 82.2%* (NOTE: Ohio had violations in Toledo and Columbus—very large population cities.) FY16 EOY: 83.7%* (NOTE: Columbus had a nitrate MCL violation in June 2016 (10.5 mg/L), which serves 1,159,817 people.)
2	% of CWS that meet health- based standards	NPM/ GPRA	PWSS overall	SDW-SP1.N11 (Updated quarterly by HQ—NPM Measures Tables)	NPM measures	FY11: 91% FY12: 94% FY13: 93% FY14: 93% FY15: 90% FY16: 90% FY17: 90%	same as item #1 above	FY17 EOY: FY11 EOY: 94.5%; FY11 4 th quarter: 94.6% FY12 EOY: 96.1% FY13 EOY: 96.4% FY14 EOY: 94.2% FY16 EOY: 95.3% FY17 EOY:
3	% of "person months" in which CWS are meeting health-based standards	NPM/ GPRA	PWSS overall	SDW-SP2 (Updated quarterly by HQ—NPM Measures Tables)	NPM measures	FY11: 91% FY12: 96% FY13: 96% FY14: 96% FY15: 95%	same as item #1 above	FY11 EOY: 98.8%; FY 11 4 th quarter: 99.2% FY12 EOY: 99.1% FY13 EOY: 99.4% FY14 EOY: 97.5%

¹ However, due to the lag between when data are submitted and when the FY ends, the actual date range of the data used for these measures is one quarter off from the FY.

#	Description	Туре	Used	Name and	File	Target	Applicable period	End-of-year (EOY) results
			for	update schedule			(e.g., CY/FY)	and comments
						FY16 : 95%		FY15 EOY: 97.4%
						FY17 : 95%		FY16 EOY: 97.2%
								FY17 EOY:
4	% of CWS with minimized risk	NPM/	PWSS	SDW-SP4a	NPM	FY11 : 41%	same as item #1	FY11 EOY: 43.3%
	b/c of SWP	GPRA	GW	(Updated annually	measures	FY12 : 43%	above	FY12 EOY: 45%
			SWP	in October by		FY13 : 43%		FY13 EOY: 45%
				States)		FY14: 43%		FY14 EOY: 50%
						FY15: 45%		FY15 EOY: 68.1%
						FY16: 50%		FY16 EOY: 58.9%
						FY17: 68%		Note: This number is different than
								what's reported in the SWP program
								end-of-year summary (69%), because
								SDWIS/State hadn't yet been updated
								when this measure was calculated for
								SDW-SP4a in December 2016.
								FY17 EOY:
5	% of population served by	NPM/	PWSS	SDW-SP4b	NPM	FY11: 62%	same as item #1	FY11 EOY: 63.4%
	CWSs with minimized risk b/c	GPRA	GW	(Updated annually	measures	FY12 : 65%	above	FY12 EOY: 73.8%
	of SWP		SWP	in October by		FY13 : 64%		FY13 EOY: 64%
				States)		FY14: 65%		FY14 EOY: 66%
						FY15 : 64%		FY15 EOY: 74.0%
						FY16 : 66%		FY16 EOY: 76%
						FY17 : 75%		Note: This number is different than
								what's reported in the SWP program
								end-of-year summary (87%), because
								SDWIS/State hadn't yet been updated
								when this measures was calculated for
								SDW-SP4b in December 2016.
								FY17 EOY:
6	% of CWS with san. survey	NPM/	PWSS	SDW-01a	NPM	FY11 : 97%	CY (e.g., July 2014	FY13 EOY: As of July 2013, 98.9% (269
	w/in the past 3 yrs	GPRA	SS	(Updated annually	measures	FY12 : 95%	data includes	out of 272) of the sanitary surveys at
				in July by HQ –		FY13 : 92%	sanitary surveys	surface water CWSs were completed
				Status queries		FY14 : 75%	at CWSs	between CY2010 and CY2012.
				updated by Region		(See NOTE	completed	FY14 EOY: As of July 2014, 99.6%
				5 in April and		in "name	between 1/1/1	(1,204 out of 1,209) of the sanitary
				October)		and update	and 12/31/13; R5	surveys at surface and ground water
							also looks at	

#	Description	Туре	Used	Name and	File	Target	Applicable period	End-of-year (EOY) results
			for	update schedule			(e.g., CY/FY)	and comments
				NOTE: This		schedule"	NCWSs	CWSs were completed between
				national measure		column.)	completed	CY2011 and CY2013.
				was modified in		FY15 : 79%	between 1/1/09	FY15 EOY: As of July 2015, 98.8%
				FY14 to include		FY16 : 79%	and 12/31/13, but	(1,200 out of 1,214) of the sanitary
				ground water		FY17 : 79%	this is not part of	surveys at active, surface and ground
				systems in			the national	water CWSs were completed between
				addition to the			measure)	CY2012 and CY2014.
				surface water				FY16 EOY: As of July 2016, 98.4%
				systems previously				(1,189 out of 1,208) of the sanitary
				tracked.				surveys at active, surface and ground
								water CWSs were completed between
								CY2013 and CY2015. FY17 EOY:
7	Fund utilization rate	NPM/	DWSRF	SDW-04	NPM	FY11: 70%	The FY14 EOY	FY11 EOY: Ohio's fund utilization rate
	[cumulative dollar amount of	GPRA		(Updated annually	measures	fund	data are	through 6/30/11 for the DWSRF was
	loan agreements divided by			as of June 30 by		utilization	cumulative as of	91% for ARRA- and base-funded
	cumulative funds available for			HQ and tracked		rate for	6/30/14.	projects and 90% for base-funded
	projects] for the DWSRF			through DWNIMS		both ARRA		projects only. Ohio surpassed the
				database)		and base		target.
						funds, as		FY12 EOY: Ohio's fund utilization rate
						well as for		through 6/30/12 for the DWSRF was
						base only		86% for ARRA- and 85% for base-
	1					funds		funded projects.*
	1					FY12: 95%		FY13 EOY: 89.6%*
						for ARRA		NOTE: Region 5's State and Tribal
						and base		Programs Branch (STPB) uses tools and
	1					FY13: same		resources other than national
						as FY12		measures SDW-04, SDW-05, and SDW-
						FY14 : 90%		11 to provide an accurate evaluation
						FY15-17:		of the state's progress in
						no state-		implementing the DWSRF program.
						specific		Region 5 believes that the most recent
						targets		DWSRF Performance Evaluation
								Report (PER), prepared by STPB with
								input from GWDWB, should be
								consulted for a more accurate status
								of the state's DWSRF program.

#	Description	Туре	Used	Name and	File	Target	Applicable period	End-of-year (EOY) results
			for	update schedule			(e.g., CY/FY)	and comments
								FY14 EOY: This measure no longer has
								state-specific targets, only a regional
								one.
8	# of DWSRF projects that have	NPM/	DWSRF	SDW-05 (Updated	NPM	FY11: 270	The FY14 EOY	FY11 EOY: Through 6/30/11, 285
	initiated operations	GPRA		annually as of June	measures	ARRA- and	data are	ARRA- and base-funded DWSRF
				30 by HQ and		base-	cumulative as of	projects had initiated operations, and
				tracked through		funded	6/30/14.	237 base-funded projects had initiated
				DWNIMS		projects		operations. Ohio surpassed the target.
				database)		and 230		FY12 EOY: Through 6/30/12, 329
						base-		ARRA- and base-funded DWSRF
						funded		projects had initiated operations.
						only		Ohio surpassed the target.
						projects		FY13 EOY: 383
						FY12: 300		FY14 EOY: This measure no longer has
						for ARRA		state-specific targets, only a regional
						and base		one.
						FY13 : 330		
						with ARRA		
						and 280		
						base		
						FY14: 410		
						FY15-17:		
						no state-		
						specific		
	0/ 550/655	21524/	D1446DE	0011111		targets	TI 5//4 5 6 7/	
9	% of DWSRF projects awarded	NPM/	DWSRF	SDW-11	NPM	This is an	The FY14 EOY	FY11 EOY: Through 6/30/11, 64%
	to small PWSs serving <500,	GPRA		(Updated annually	measures	indicator—	data are	(cumulative) of total DWSRF assistance
	501-3,300, & 3,301-10,000			as of June 30 by		there are	cumulative as of	agreements were with PWSs serving
	consumers			HQ)		no state	6/30/14.	less than 10,001 people.
						targets.		FY12 EOY: 66% (through 6/30/12)
								FY13 EOY: 63% (through 6/30/13)
								FY14 EOY: This is now an indicator
								reported on a regional basis.
10	# & % of small CWS and	NPM/	PWSS	SDW-15	NPM	This is an	same as item #1	FY11 EOY : 2% (39 out of 1,874)
	NTNCWS (<500, 501-3,300, &	GPRA		(Updated annually	measures	indicator;	above	FY12 EOY: 1.5% (28 out of 1,838)
	3,301-10,000) w repeat			in October by HQ)		there are		FY13 EOY: 1.6% (29 out of 1,806)

#	Description	Туре	Used	Name and	File	Target	Applicable period	End-of-year (EOY) results
			for	update schedule			(e.g., CY/FY)	and comments
	health-based NO ₃ & NO ₂ ,					no state		FY14 EOY: 1.7% (31 out of 1,778)
	Stage 1 D/DBP, SWTR, & TCR					targets.		FY15 EOY: 0.7% (12 out of 1,763)
	violations							FY16 EOY: 0.1% (1 out of 1,752)
								R5 recognizes Ohio for this
								accomplishment.
								FY17 EOY:
11	# & % of schools and childcare	NPM/	PWSS	SDW-17	NPM	This is an	same as item #1	FY11 EOY: 91% (304 out of 333)
	centers that meet all health-	GPRA		(Updated annually	measures	indicator;	above	FY12 EOY: 94.7% (301 out of 318)
	based DW standards			in October by HQ,		there are		FY13 EOY: 93.8% (285 out of 304)
				but can be		no state		FY14 EOY: 93.2% (275 out of 295)
				generated from		targets.		FY15 EOY: 97.2% (278 out of 286)
				quarterly NPM				FY16 EOY: 95.7% (269 out of 281)
				measure)				FY17 EOY:
12	# of dw and ww utilities and	NPM/	PWSS	SDW-21 (Updated	TBD	This is an	TBD	FY15 EOY: This measure is reported by
	local, state, and fed officials	GPRA		annually in		indicator;		headquarters.
	receiving training and tech			October by HQ)		there are		FY16 EOY:
	assistance to enhance					no state		FY17 EOY:
	emergency prep and					targets.		
	resiliency to reduce risk from							
	all hazards, including those							
	attributed to climate change							
	e of Enforcement and Compliance					I	1	
13	During FY2016, the primacy	NPM/	PWSS	SDWA02	ETT	FY11: Ohio	The ETT is	Ohio's 2016 commitment is to address
	agency must address with a	OECA	ECA	(Updated quarterly	(OECA's	committed	generated on a	or resolve 32 systems. Ohio's FFY 2016
	formal enf action or RTC the #			by HQ at	<u>ECHO</u>	to	quarterly basis	end-of-year results show that Ohio
	of priority systems equal to			https://echo.epa.g	drinking	addressing	with the measure	had addressed 74 systems (25 from
	the # of its PWSs that have a			ov/targeting/safe-	water data	or	based on FY ² .	the original 32 on the July 2015 fixed
	score of 11 or higher on the			drinking-water-	website)	resolving		base list plus an additional 49 that had
	July 2015 ETT report			act-enforcement-		152		become priority systems after July
				targeting-tool-		systems.		2015). Ohio is commended for this
	Ohio will commit to			<u>reports</u>)		FY12 : 122		accomplishment in well exceeding its
	addressing with a formal					FY13 : 78		2016 commitment.
	enforcement action or RTC at					FY14 : 42		

⁻

² Each quarterly ETT calculation includes the most current data in the associated SDWIS/FED data freeze. For example, the October 2012 ETT includes data through 6/30/2012. The ETT retrieves addressed violations going back 5 years from the most current data (i.e., for October 2012, the ETT retrieves addressed violations from 7/1/2007 to 6/30/2012). Note that addressed violations do not contribute to ETT scores. In addition, the ETT score includes all un-addressed violations, even if they are more than 5 years old.

#	Description	Туре	Used for	Name and update schedule	File	Target	Applicable period (e.g., CY/FY)	End-of-year (EOY) results and comments
	least 32 systems, which is the number of priority systems that have a score of 11 or			·		FY15: 47 FY16: 32 FY17: 24	, , ,	
	higher on the July 2015 ETT							
	report.							
Regio	onal Shared Goals	•						
14	 % of NTNCWSs meeting all health-based standards % of TNCWSs meeting all health-based standards % of population served by CWSs with significant/major monitoring violations (includes LCR Type 66 violations) % of CWSs with significant /major monitoring violations (includes LCR Type 66 violations) % of CWSs with significant /major monitoring violations (includes LCR Type 66 violations) % of NTNCWSs with significant/major 	Shared Goals		Updated annually in April by Region 5; the milestones were revised in CY12	Regional shared goals	By CY2016: 1 = ≥95% 2 = ≥95% 3 = <5% 4 = <10% 5 = <5% 6 = <10% 7 = <10%	СУ	CY2014: 1 = 93.1%* 2 = 93.8%* 3 = 3.5% (3.0% without Type 66) 4 = 13.9%* (10.1% without Type 66) 5 = 2.3% 6 = 14.2%* (5.4 % without Type 66) 7 = 8.0% Ohio is commended for significantly improving implementation of shared goals 3, 4, and 7; and all of the other shared goals also improved between 2013 and 2014. CY2015: A new query was developed so that the CY2015 and CY2016 data will be comparable to the CY2014
	monitoring violations for acute health risks 6. % of NTNCWSs with significant/major monitoring violations for chronic health risks (LCR Type 66 violations are not included, not considered chronic) 7. % of TNCWSs with significant/major monitoring violations							data. These results include Type 66 violations. 1 = 94.9% 2 = 93.2%* 3 = 4.1% 4 = 16.1%* 5 = 2.6% 6 = 17.4%* 7 = 6.8% CY2016 1 = 96.5%

#	Description	Туре	Used for	Name and update schedule	File	Target	Applicable period (e.g., CY/FY)	End-of-year (EOY) results and comments
			101	upatic stricture			(cigi, ci, i i)	2 = 98.0% 3 = 1.8% 4 = 10.9%* 5 = 1.7% 6 = 11.6%* 7 = 8.0%
High	Priority Queries							
15	New Rule Violation Completeness Reporting (RTCR, GWR, LCRSTR, Stage 2, LT2, and 141.130(c) operator certification treatment technique requirements)	R5 High Priority	PWSS DM	Updated quarterly by Region 5	R5 high priority query— new rule completen ess reporting	None.	N/A—this query pulls all violations for the new rules ever reported for any system type	January 2017 (active systems only): LT2: 31 TT violations and 3 M/R violations GWR: 5 TT violations, 427 M/R violations, and 1 other violation; SDWIS/Fed shows that there are no type 41 TT (failure to maintain microbial treatment) or type 05 (notification, state) and 73 (failure to notify other PWS) other violations reported. Stage 1: 0 TT (type 12) violations Stage 2: 233 MCL and 460 M/R violations LCRSTR: 577 M/R violations
16	SW and GW Sanitary Survey Completeness	R5 High Priority	PWSS Sanitary Surveys GWR	Updated in April and October by Region 5 NOTE: This is a national measure beginning in FY14.	R5 high priority query— surface and ground water sanitary survey completen ess	None.	CY (e.g., July 2014 data will include CWS sanitary surveys completed between 1/1/11 and 12/31/13 and NCWS sanitary surveys completed	As of October 2016, for sanitary surveys conducted at CWSs between CY2014 and CY2016 and at NCWSs between CY2012 and CY2016: Surface water systems: 80.3% of CWSs and 100% of NTNCWSs and TNCWSs completed sanitary surveys; and Ground water systems: 83.9% of CWSs, 91.6% of NTNCWSs, and 90.6% of TNCWSs completed sanitary surveys.

#	Description	Туре	Used	Name and	File	Target	Applicable period	End-of-year (EOY) results
			for	update schedule			(e.g., CY/FY)	and comments
							between 1/1/10	
							to 12/31/14) ³	
17	Arsenic MCL Non-compliance	R5 High	PWSS	Updated annually	R5 high		This query is	As of January 2016, 8 systems (out of
	(% CWS/NTNCWS systems in	Priority	As	in January by	priority		based on data in	4,633) had arsenic MCLs that were not
	violation)			Region 5	query—		the 4th quarter	RTC'd, including 4 CWSs (out of 1,218)
					arsenic		national program	and 4 NTNCWSs (out of 674).
					MCL non-		measure tables	As of January 2017 , 5 systems (out of
					complianc		(e.g., the January	4,561) had arsenic MCLs that were not
					е		2014 query covers	RTC'd, including 2 CWSs (out of 1,209)
							the period from	and 3 NTNCWSs (out of 669).
							10/1/2012 to	
							9/30/2013).	

³ This will be measured in July 2013 for CWSs surveys completed between 1/1/10 to 12/31/12, in July 2014 for NCWSs surveys completed between 1/1/10 to 12/31/14, and then every year after that (with rolling three-year periods).

11. OHIO ENVIRONMENTAL PROTECTION AGENCY FY2016 DRINKING WATER ANNUAL RESOURCE DEPLOYMENT PLAN (ARDP) Federal Fiscal Year 2016 (October 1, 2015 to September 30, 2016)

Click here to go the table of contents (by placing cursor over the link and pressing down the

Notes: Region 5 comments are in tracked changes. Please see the program summaries for more details.

"Ctrl" key while clicking the left mouse button).

Not all state Public Water System Supervision (PWSS) programs have access to enough resources to implement all of the provisions of existing drinking water regulations, and other primacy program requirements. Therefore, we need to plan for circumstances where resources are inadequate to implement the entire drinking water protection program. Since the purpose of the Safe Drinking Water Act (SDWA) is to protect public health, federal and state agencies have an obligation to ensure that limited resources are deployed in a way that ensures maximum health protection benefit, and that we collectively keep track of what is and is not being done as we strive for full implementation.

The plan documents what will and will not be done during the year. However, this FY16 work plan only highlights the program areas where there are discrepancies between the federal requirements and State implementation. These are noted with an asterisk (*) in the State/U.S. EPA evaluation column. If there is no asterisk in a particular row, Ohio is considered to be fulfilling that requirement without any discrepancies. Additional information about the implementation of Ohio's PWSS program can be found on the Region 5 State PWSS Programs Quickr site at: https://epaqpx.rtp.epa.gov/Region5statepwssprograms (see each of the activity summaries in the "Ohio" room). The agreement reflects state capacity based on available resources, as well as local health protection priorities. Core activities, such as explaining regulation requirements to public water supplies, and tracking and reporting violations, are fundamental to the integrity of the public health protection program and are not amenable to priority setting. U.S. EPA will participate and support state implementation efforts where appropriate and possible. U.S. EPA commitments in support of state programs are listed in the table.

The state and U.S. EPA will both report annually on their accomplishments so we can jointly appraise our effectiveness, and our progress toward implementing the complete program. Where resource shortfalls continue to exist, the state and U.S. EPA will simultaneously continue efforts to obtain additional resources in order to fill the resource gap. State and U.S. EPA efforts to obtain additional resources necessary to fill the gaps associated with temporarily disinvested activities (documented in this ARDP and also on the Quickr site—click here) will be tracked in the end-of-year (EOY) evaluation reports. State progress in implementing these temporarily disinvested activities also will be documented in the EOY reports.

Using this resource deployment plan as a framework for annual planning and progress assessment should meet several objectives:

- (1) Promote clear understanding of both state and U.S. EPA commitments.
- (2) Minimize ad hoc requests for program reporting.
- (3) Promote judicious use of limited resources to achieve the best possible public health protection.

- (4) Support efforts to increase resources by clearly identifying resource and program constraints.
- (5) Promote collaborative interagency program planning and implementation.

PUBLIC WATER SYSTEM SUPERVISION PROGRAM CORE STATE ACTIVITIES

- ⇒ Provide an <u>adequate laboratory certification program</u> for all regulated contaminants. This does not mean that states must expand their labs to perform all the analyses. At a minimum, a state should have an adequate certification program to certify commercial labs within the state.
- ⇒ Maintain a <u>data management system</u> that tracks requirements for all rules. This means to have the appropriate combination of hardware, software and personnel to accurately and within a reasonable timeframe identify the inventories (including routine updates of system information), maintain water quality monitoring information, and track compliance with all M/R, MCL, MRDL, TT, PN and public information requirements.
- \Rightarrow <u>Keep adequate records</u> of pertinent state decisions.
- ⇒ Adopt all rules in a timely manner (within two-year extension period).
- ⇒ Notify all systems of regulatory requirements and respond to questions.
- ⇒ Determine violations for all rules and report to U.S. EPA.¹
- ⇒ <u>Maintain</u> an <u>adequate enforcement</u> and compliance assistance program (adequacy determined by a decrease in violation frequency).
- ⇒ Maintain a baseline core of individuals with the technical expertise needed, to <u>perform</u> sanitary surveys, plan and spec reviews, and respond to emergencies.
- ⇒ To improve our ability to understand, measure, assess, and communicate progress, conduct a joint evaluation of program performance with EPA.
- ⇒ Develop and implement a plan to <u>provide adequate funding</u> to carry out all functions of the PWSS program.

¹ .F.R. 140.15. These data must be reported in XML format and utilize the Central Data Exchange (CDX) as the media for data transfer to U.S. EPA. The reporting schedule for States to the national data base, SDWIS/FED-ODS, is as follows: FFYQ1 – February 15, FFYQ2 – May 15, FFYQ3 – August 15, and FFYQ4 – November 15. If the data is not reported within 60 days, the Region will raise the issue to the State Director's attention.

CORE R5 ACTIVITIES

- ⇒ Respond to questions from our state programs about regulations. Train state staff about regulations by offering in-state and/or regional training opportunities.
- ⇒ Maintain a forum for U.S. EPA and state communications through the monthly U.S. EPA and state conference calls, hold an annual meeting, and conduct additional meetings/calls as needed.
- ⇒ Determine whether primacy applications are completed, track primacy submittal/review for all rules, and provide comments on draft rules, as requested.
- ⇒ Communicate and track reporting required for new rules by state.
- ⇒ Assist states in acquiring resources to carry out all functions of the PWSS program.
- ⇒ Monitor specific regulations related to state follow-up to the findings of the last file review and enforcement verification reports, as indicated in the "R5 Activities" column.

Acronyms/A	bbreviations							
ACR – Annual Compliance Report	NCWS – Non-Community Water System							
ACS – Annual Commitment System	NPDWR – National Primary Drinking Water Regulation							
ARDP – Annual Resource Deployment Plan	NPDWR CDVRT – Compliance Determination and							
ASDWA – Association of State Drinking Water	Violation Reporting Tool							
Administrators	NPM – National Program Manager							
CCR – Consumer Confidence Report	NTNCWS – Non-Transient Non-Community Water System							
CEU – Continuing Education Credit	OECA – Office of Enforcement and Compliance Assurance							
C.F.R. – Code of Federal Regulations	OCCT – Optimal Corrosion Control Treatment							
CPE – Comprehensive Performance Evaluation	PN – Public Notification							
CTA – Comprehensive Technical Assistance	PWS – Public Water System							
CWS – Community Water System	PWSID – Public Water System Identification							
DBP – Disinfection By-Products	PWSS – Public Water System Supervision							
D/DBPR – Disinfectants and Disinfection By-Products Rule	RTCR – Revised Total Coliform Rule							
DWSRF – Drinking Water State Revolving Fund	SDWA – Safe Drinking Water Act							
EOY – End-of-year	SDWIS/FED – Safe Drinking Water Information							
ERP – Enforcement Response Policy	System/Federal version							
ETT – ERP Enforcement Targeting Tool	SDWIS/State – Safe Drinking Water Information							
EV – Enforcement Verification	System/State version							
FBRR – Filter Backwash Recycling Rule	SOC – Synthetic Organic Contaminant							
GWR – Ground Water Rule	SOX – "SOX" is a code in SDWIS/FED that indicates the							
GWS – Ground Water System	state entered a return to compliance for a violation							
GUDI – Ground Water under the Direct Influence of Surface	SPM – U.S. EPA Region 5 Ground Water and Drinking							
Water	Water Branch State Program Manager							
IESWTR – Interim Enhanced Surface Water Treatment Rule	Stage 2 – The Stage 2 Disinfectants and Disinfection By-							
IOC – Inorganic Contaminant	Products Rule							
LCR – Lead and Copper Rule	SWC – Source Water Collaborative							
LCRSTR – Lead and Copper Rule Short-term Revisions	SWI – Sustainable Water Infrastructure							
LT1ESWTR – Long-Term 1 Enhanced Surface Water	SWP – Source Water Protection							
Treatment Rule	SWTR – Surface Water Treatment Rule							
LT2ESWTR – Long-Term 2 Enhanced Surface Water	TCR – Total Coliform Rule							
Treatment Rule	TMDL – Total Maximum Daily Load							
MCL – Maximum Contaminant Level	TT – Treatment Technique							
M/R – Monitoring/Reporting	VOC – Volatile Organic Contaminant							
MRDL – Maximum Residual Disinfectant Level								

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	Table 1. Prim	acy Activities	
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 - Surface Water Treatm	ent Rules: FBRR, SWTR, IE	SWTR, LT1ESWTR, LT2ES	WTR
1.1 – Submit primacy applications	See the Ohio <u>"rules and primacy"</u>		
and revisions as necessary.	work plan summary for information		
Click here to go back to the table of	about the status of primacy applications.		
contents (by pressing and holding the	applications.		
"Ctrl" key while clicking the left mouse			
button).			
1.2 – Notify all surface water and		As requested, promote	
GUDI systems of their LT2 regulatory requirements.		understanding of surface water treatment regulations by conducting	
regulatory requirements.		presentations at State water industry	
		organization functions.	
1.3 – Maintain a database		States with the most recent version	
management system that accurately		of SDWIS/State can use it to enter	
tracks the inventory (including		LT2 sample data for the second	
routine updates of system information) and violations for the		round of source water monitoring	
Surface Water Treatment Rules.		scheduled to begin April 2015.	
1.4 – Electronically report all TT,		R5 will evaluate the extent to which	
M/R, and PN violations and		LT2 violations are reported to	
inventory updates to SDWIS/FED		SDWIS/FED.	
for all surface water systems.			

Table 1. Primacy Activities				
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation	
1.0 - Surface Water Treatme	ent Rules: FBRR, SWTR, IE	SWTR, LT1ESWTR, LT2ES	WTR	
1.5 – Conduct and report sanitary surveys at surface water (40 C.F.R. Part 141 Subpart H) systems. See also section 4.0 of the "primacy activities" table.		Provide training, as requested. Region 5 tracks progress related to State and EPA efforts to obtain additional resources necessary to enable Ohio to engage in resolving program discrepancies and temporary disinvestments.		
1.6 – Ensure that all surface water and GUDI systems that notify the State that they recycle spent filter backwash water, thickener supernatant, or liquids from dewatering processes, return these flows through the processes of a system's existing conventional or direct filtration system, or at an alternate location approved by the State.				
1.7 – Use sanitary surveys, CPEs, other inspections, or other activities to evaluate recycled backwash water practices when they occur at surface water and GUDI systems. When those practices are not in compliance with the FBRR, require the system to modify the practices to achieve compliance.				

Table 1. Primacy Activities				
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation	
1.0 - Surface Water Treatme	ent Rules: FBRR, SWTR, IES	SWTR, LT1ESWTR, LT2ES	WTR	
1.8 – Ensure that filter/disinfection				
practices are adequate to achieve				
inactivation/removal requirements				
for regulated microbial contaminants				
found in surface water sources.				
1.9 – Follow-up on turbidity TT and		Region 5 will assist as necessary, or		
individual filter turbidity M/R		as requested.		
violations.				
(a) Track individual filter turbidity				
trigger exceedances.				
(b) Track completion of individual				
filter turbidity profiles for systems				
exceeding individual filter triggering				
criteria.				
1.10 – When required by rule:				
(a) track the completion of				
CPE/CTA for PWSs and				
(b) ensure that disinfection profiling				
and benchmarking is conducted.				
1.11 – Ensure that a residual				
disinfectant concentration is				
measured according to rule				
requirements.				
1.12 – Follow-up on disinfection		Region 5 will assist as necessary, or		
residual TT and M/R violations.		as requested		
1.13 – Report treatment data (e.g.,				
treatment codes for all surface water,				
GUDI, and purchased GUDI				
sources; seller's PWSID number for				
purchased surface water and				
purchased GUDI sources, etc.).				

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
2.0 – Total Coliform Rules:	TCR and RTCR		
2.1 – Maintain a database management system that accurately tracks the inventory (including routine updates of system information) and violations for the TCR. Click here to go back to the table of contents (by pressing and holding the "Ctrl" key while clicking the left mouse			
button). 2.2 – Electronically report all TCR MCL, M/R, and PN violations and inventory updates to SDWIS/FED for all public water systems. 2.3 – Follow-up on all MCL and M/R violations and determine a proper course of action to ensure public health protection.		Region 5 will assist as necessary, or as requested.	
2.4 – Plan for the transition from TCR to the Revised Total Coliform Rule (RTCR) to ensure that adequate resources are dedicated such that the State can begin implementing RTCR by April 1, 2016.	Please provide the State's schedule for implementing the RTCR here—or in the rule and primacy work plan summary.	EPA headquarters has provided national training, and R5 will continue to participate in Statespecific training, to the extent possible.	

	Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation	
3.0 – Ground Water Rule				
3.1 – Submit primacy applications and revisions as necessary. Click here to go back to the table of contents (by pressing and holding the "Ctrl" key while clicking the left mouse button).	Please insert here—or in the rule and primacy work plan summary—actual or anticipated dates for State adoption and final primacy applications. See the Ohio "rules and primacy" work plan summary for information about the status of primacy applications.			
3.2 – Notify all public water systems of their GWR regulatory requirements				
3.3 – Maintain a database management system that accurately tracks the inventory (including routine updates of system information) and violations for the GWR.				
3.4 – Electronically report all TT, M/R, and PN violations and inventory updates to SDWIS/FED for all public water systems.		R5 will evaluate the extent to which GWR violations are reported to SDWIS/FED.		
3.5 – Conduct and report sanitary surveys that meet requirements by 12/31/12 at CWSs and then every 3 years thereafter, and by 12/31/14 at NCWSs served by a groundwater source and then every 5 years thereafter. See also section 4.0 of the "primacy activities" table.				

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
3.0 – Ground Water Rule			
3.6 – Ensure that GWSs that must			
treat to the 4-log virus			
removal/inactivation standard			
conduct compliance monitoring to			
demonstrate treatment effectiveness.			
3.7 – Determine appropriate			
corrective actions in consultation			
with GWSs that collect fecal			
indicator-positive source water			
sample(s) or that have significant			
deficiencies.			
3.8 – Determine if optional source			
water monitoring will be used. If so,			
apply monitoring requirements to			
selected systems.			
3.9 – Follow-up on, and return to		Region 5 will assist as necessary, or	
compliance:		as requested.	
(a) corrective action consultation			
and reporting violations,			
(b) TT violations,			
(c) M/R violations,			
(d) public notification violations,			
and			
(e) other discovered			
recordkeeping/reporting violations.			

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
4.0 – Sanitary Surveys			
4.1 – A completed sanitary survey		R5 will measure completeness of	
means the date a sanitary survey		surface water and ground water	
visit was conducted in which all		sanitary surveys within the	
eight sanitary survey components		evaluation time period (three or five	
have been addressed per		years). This national measure will	

Table 1. Primacy Activities						
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation			
4.0 – Sanitary Surveys	4.0 – Sanitary Surveys					
142.16(b)(3)(i). If a sanitary survey takes multiple days or visits to complete, only the latest date or last visit is expected to be reported for the final visit date that completes the eight components of a sanitary survey.		be measured again in July 2015 for the period of 2012 to 2014 and in July 2016 for the period of 2013 to 2015.				
Click here to go back to the table of contents (by pressing and holding the "Ctrl" key while clicking the left mouse button).						
4.2 – Consider using sanitary surveys to evaluate and document status and progress of Source Water Protection (SWP) and Sustainable Water Infrastructure (SWI) activities (see section 4.0 of the "other activities" table and section 1.0 of the "national and regional EPA priorities" table below, respectively).		EPA encourages State surveyors and inspectors to recommend the following activities to PWS managers during sanitary surveys, because these activities can help in building the capacity and long-term independence of PWSs: - Asset management programs; - Energy efficiency programs; - Water loss monitoring/mitigation programs; - Source water protection and climate change adaptations; and - Other involvement or roles in the local community. As requested, EPA can help promote training about these topics and provide outreach information, as well as updates and guidance materials, about these types of activities.				

Table 1. Primacy Activities				
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation	
5.0 – Nitrate and Nitrite				
5.1 – Maintain a database				
management system that accurately				
tracks the inventory (including				
routine updates of system				
information) and tracks				
nitrate/nitrite violations.				
Click house to so back to the table of				
Click here to go back to the table of contents (by pressing and holding the				
"Ctrl" key while clicking the left mouse				
button).				
5.2 – Electronically report all MCL,				
M/R, and PN violations and				
inventory updates to SDWIS/FED				
for all public water systems.				
5.3 – Follow-up on all MCL and		Region 5 will assist as necessary, or		
M/R violations and determine a		as requested.		
proper course of action to ensure				
public health protection.				

Table 1. Primacy Activities				
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation	
6.0 – Lead and Copper				
6.1 – Incorporate rule revisions into	States to provide comments on the	The LCR LTR proposed rule date is		
State oversight and enforcement	proposed LCR long-term revisions	TBD. R5 will provide training on		
operations.	(LCR LTR), as appropriate.	the proposal, including a summary		
		of EPA's specific requests for		
Click here to go back to the table of		comment and guidance on		
contents (by pressing and holding the		submitting comments to EPA.		
"Ctrl" key while clicking the left mouse				
<u>button).</u>				
6.2 – Notify all CWSs and				
NTNCWSs of their LCRSTR				
regulatory requirements				

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
6.0 – Lead and Copper			
6.3 – Maintain a database management system that accurately tracks lead and copper action level exceedances (sample data), violations, and milestone data for CWSs and NTNCWSs. 6.4 – Electronically report violation and milestone data to SDWIS/FED for all CWSs and NTNCWSs, lead and copper 90 th percentile action level sample data for all large and medium sized systems, and 90 th percentile action level exceedance sample data for small systems.	Indicate here (or in the rule and primacy work plan summary) whether the State is fully implementing the LCRSTR lead consumer notification requirement to (1) notify systems of the lead consumer notice requirement to provide the results to the consumer and (2) track and report violations. Indicate here (or in the rule and primacy work plan summary) the State's schedule for full implementation, if the State is not fully implementing this requirement. See Tom Poy's January 13, 2012, email requesting that States develop a plan for full implementation of this requirement by April 1, 2012.	Request referrals from the State to provide compliance assistance to PWSs that fail to issue lead consumer notice. R5 will evaluate the extent to which LCRSTR violations are reported to SDWIS/FED. R5 expects that compliance determination and violation reporting tool (CDVRT) training will be conducted when all of the CDVRT modules are completed.	
6.5 – Designate OCCT and follow- up on OCCT installation violations at all required PWSs.			
6.6 – Follow-up on all M/R violations.		Region 5 will assist as necessary, or as requested.	
6.7 – Set optimal water quality parameter ranges and/or minimum values for all CWSs and NTNCWSs where required by the LCR.			

	Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation	
7.0 – D/DBPRs				
7.0 – D/DDI KS 7.1 – Submit primacy applications and revisions as necessary. Click here to go back to the table of contents (by pressing and holding the "Ctrl" key while clicking the left mouse button). 7.2 – Notify all CWSs and NTNCWSs (serving greater than 10,000 people) delivering water that has been treated with a primary or residual disinfectant (other than ultraviolet light) of their Stage 2 regulatory requirements. 7.3 – Maintain a database management system that accurately tracks the inventory (including routine updates of system information) and violations for the	See the Ohio "rules and primacy" work plan summary for information about the status of primacy applications.			
D/DBP rules. 7.4 – Electronically report all MCL, M/R, TT, and PN violations and inventory updates to SDWIS/FED for all public water systems, including operator certification treatment technique violations per 40 CFR 141.130(c).		R5 will evaluate the extent to which Stage 2 violations and 141.130(c) operator certification treatment technique violations are reported to SDWIS/FED. Region 5 tracks progress related to State and EPA efforts to obtain additional resources necessary to enable Ohio to engage in resolving program discrepancies and temporary disinvestments.	*Ohio EPA is not reporting 40 CFR 141.130(c) operator certification treatment technique violations—that is, type 12 violations for failure to have a certified operator as required by the Stage 1 Disinfectants and Disinfection Byproducts Rule (D/DBPR). Ohio does issue violations for failure to have an operator, but they are not DBP treatment technique violations.	

Table 1. Primacy Activities				
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation	
7.0 – D/DBPR s				
7.5 – Follow-up on:		Region 5 will assist as necessary, or		
(a) all MCL/MRDL violations,		as requested.		
including chlorine dioxide MRDL				
violations;				
(b) all M/R violations;				
(c) all other reporting requirement				
violations.				
7.6 – Ensure that Subpart H systems		Region 5 will assist as necessary, or		
using conventional filtration operate		as requested.		
in compliance with the DBP				
precursor control treatment				
technique requirements.				
7.7 – Determine which systems do				
not qualify for reduced monitoring				
and inform them they must return to				
the routine monitoring frequency.				

		Table 1. Primacy Activities			
State Commitment	Region 5 Activities	State/U.S. EPA Evaluation			
ic)					
See the Ohio <u>"rules and primacy"</u>					
about the status of primacy					
applications.					
	See the Ohio <u>"rules and primacy"</u> work plan summary for information about the status of primacy	See the Ohio "rules and primacy" work plan summary for information about the status of primacy			

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
8.0 – IOCs (including Arsen	ic)		
IOCs.			
8.3 – Electronically report all MCL,		R5 will evaluate arsenic MCL non-	
M/R, and PN violations and		compliance as reported in	
inventory updates to SDWIS/FED		SDWIS/FED.	
for all CWSs and NTNCWSs.			
8.4 – Follow-up on MCL and M/R		Region 5 will assist as necessary, or	
violations and take an appropriate		as requested.	
course of action that ensures public			
health protection.			

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
9.0 – Radionuclides (includi	ng Radon)		
9.1 – Maintain a database			
management system that accurately			
tracks the inventory (including			
routine updates of system			
information) and violations for			
radionuclides.			
Click here to go back to the table of			
contents (by pressing and holding the "Ctrl" key while clicking the left mouse			
button).			
9.2 – Electronically report all MCL,			
M/R, and PN violations and			
inventory updates to SDWIS/FED			
for all CWSs.			
9.3 – Follow-up on MCL and M/R		Region 5 will assist as necessary, or	
violations and take an appropriate		as requested.	
course of action that ensures public			
health protection.			

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Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
10.0 – SOCs			
10.1 – Maintain a database management system that accurately tracks the inventory (including routine updates of system information) and violations for the SOCs.			
Click here to go back to the table of contents (by pressing and holding the "Ctrl" key while clicking the left mouse button).			
10.2 – Electronically report all MCL, M/R, and PN violations and inventory updates to SDWIS/FED for all CWSs and NTNCWSs.			
10.3 – Follow-up on MCL and M/R violations and take an appropriate course of action that ensures public health protection.		Region 5 will assist as necessary, or as requested.	

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
11.0 – VOCs			
11.1 – Maintain a database			
management system that accurately			
tracks the inventory (including routine updates of system			
information) and violations for			
VOCs.			
Click here to go back to the table of			
"Ctrl" key while clicking the left mouse			
button).			
11.2 – Electronically report all VOC			
MCL, M/R, and PN violations and			
inventory updates to SDWIS/FED			
for all CWSs and NTNCWSs.		D : 7 'II : 4	
11.3 – Follow-up on MCL and M/R violations and take an appropriate		Region 5 will assist as necessary,	
course of action that ensures public		or as requested.	
health protection.			

Table 1. Primacy Activities				
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation	
12.0 - Organic and Inorgani	12.0 - Organic and Inorganic Chemical Monitoring Waiver Program			
12.1 – Any changes to the originally approved waiver program must be submitted to Region 5 for approval.				
Click here to go back to the table of contents (by pressing and holding the "Ctrl" key while clicking the left mouse button).				

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
13.0 – Sodium			
13.1 – Maintain a database			
management system that accurately			
tracks the inventory (including			
routine updates of system			
information) and violations for			
sodium M/Rs.			
Click here to go back to the table of			
contents (by pressing and holding the			
"Ctrl" key while clicking the left mouse			
button).			
13.2 – Notify appropriate local and			
State health departments of the			
sodium levels in CWS drinking			
water.			
13.3 – Follow-up on M/R violations.		Region 5 will assist as necessary,	
		or as requested.	

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
14.0 – Public Notification			
14.1 – Notify all public water			
systems of their public notification			
requirements.			
Click here to go back to the table of			
contents (by pressing and holding the			
"Ctrl" key while clicking the left mouse			
<u>button).</u>			
14.2 – Maintain a database			
management system that accurately			
tracks PN violations.			
14.3 – Electronically report all			
public notification violations to			
SDWIS/FED.			

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Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
14.0 – Public Notification			
14.4 – Follow-up on all Tier 1 violations.		Region 5 will assist as necessary, or as requested.	*See Ohio EPA's plan and schedule for fully implementing PN dated November 4, 2016.
		Region 5 tracks progress related to State and EPA efforts to obtain additional resources necessary to enable Ohio to engage in resolving program discrepancies and temporary disinvestments.	
14.5 – Follow-up on all Tier 2 violations.		Region 5 will assist as necessary, or as requested.	*See row 14.4.
14.6 – Follow-up on all Tier 3 violations.		Region 5 will assist as necessary, or as requested.	*See row 14.4.

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
15.0 – CCR			
15.1 – Notify all regulated water systems of their CCR requirements.		A memorandum signed on January 3, 2013, clarifies electronic delivery options for CCRs (see	
Click here to go back to the table of contents (by pressing and holding the "Ctrl" key while clicking the left mouse button).		http://water.epa.gov/lawsregs/rules regs/sdwa/ccr/upload/ccrdeliveryo ptionsmemo.pdf).	
15.2 – Maintain a database management system that accurately tracks CCR violations.			
15.3 – Electronically report all CCR violations to SDWIS/FED.			

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Table 1. Primacy Activities			
. EPA Evaluation			
PA's plan and schedule lementing CCR dated, 2016.			
)			

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
16.0 – Laboratory Certificat	ion	-	
16.1 – In order to maintain		In preparation for the second round	
primacy, the States must comply		of LT2 monitoring (scheduled to	
with 40 CFR 142.10, which		begin in April 2015), "Frequently	
includes the following provisions:		Asked Questions: State	
		Approval/Oversight of	
(a) 142.10(b)(4) – Assurance of the		Cryptosporidium Laboratories	
availability to the State of		Supporting LT2 Monitoring" are	
laboratory facilities certified by the		available online at:	
Administrator and capable of		http://water.epa.gov/lawsregs/rulesr	
performing analytical		egs/sdwa/lt2/upload/epa815F13001.	
measurements of all contaminants		<u>pdf</u> .	
specified in the State primary			
drinking water regulations.			
(b) 142.10(b)(3)(i) – The			
establishment and maintenance of a			
State program for the certification			
of laboratories conducting			
analytical measurements of			
drinking water contaminants			
pursuant to the requirements of the			
State primary drinking water			
regulations including the			
designation by the State of a			
laboratory officer, or officers,			
certified by the Administrator, as			
the official(s) responsible for the			
State's certification program.			
All laboratories that produce results			
for compliance with SDWA are			
certified by the State to which those			
results are reported. These			
certifications shall be done at a			
frequency of at least once every			

Table 1. Primacy Activities					
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation		
16.0 – Laboratory Certificat	tion				
three years and will meet all					
requirements of 40 C.F.R. parts 141					
and 142. Guidance for these					
certifications is provided in the					
EPA Manual for the Certification of					
<u>Laboratories Analyzing Drinking</u>					
Water, Fifth Edition. Third parties					
may be used to conduct the on-site					
inspections of the laboratories, but					
the certifications must be issued by					
an appropriate State official.					
Click here to go back to the table of					
contents (by pressing and holding the					
"Ctrl" key while clicking the left					
mouse button).					
16.2 – EPA recommends that the					
State has a process for ensuring					
capacity to analyze at the Principal					
State Lab or commercial labs all					
NPDWR parameters that are					
required to be sampled in the State.					

Table 1. Primacy Activities						
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation			
17.0 – Compliance and Enforcement Management						
17.1 – Participate with R5 in compliance and enforcement planning actions, including referrals, Enforcement Verification audits, and State compliance and enforcement strategy updates.	Each State should include here (or in the compliance and enforcement work plan summary) whether its strategy is current/relevant and if not, its plan to update it.	R5 will conduct EV audits as resources allow.				
Click here to go back to the table of contents (by pressing and holding the "Ctrl" key while clicking the left mouse button).						
17.2 – The State will conduct compliance assistance and enforcement activities to help prevent systems from becoming ERP priorities and to address or resolve ERP priority systems within six months after being identified as priorities.		Assist with enforcement referrals, enhanced data exchange, analysis, data clean up, or other joint efforts as requested by State.				
17.3 – Evaluate compliance with all rules for which the State has primacy. Respond to all violations, provide compliance assistance where appropriate and escalate to formal enforcement where systems have not returned to compliance in a timely way or are not complying with a schedule to return to compliance.	Each State should note here (or in the compliance and enforcement work plan summary) any disinvestments already agreed to or alternative approaches or disinvestments to discuss. Ohio's temporary disinvestments are documented in this ARDP and also on the Quickr site—click here.	Assist with enforcement referrals, analysis, data clean up, or other joint efforts as requested by State.				
17.4 – The State will send R5 an update on compliance and enforcement activities within the timeframe requested in the quarterly ERP letter. 17.5 – Electronically report State	The State will update SDWIS/FED	Each quarter, R5 will send the States updated ERP reports requesting a State update. R5 will integrate State updates into reports before the next request is sent out.				

Table 1. Primacy Activities						
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation			
17.0 – Compliance and Enfo	17.0 – Compliance and Enforcement Management					
formal enforcement actions, return to compliance (SOX) dates, and deactivation dates to SDWIS/FED, and correct data errors in SDWIS/FED, which result in systems erroneously being classified as priorities based on the ERP. Reporting SOX dates and enforcement actions and ensuring to link enforcement actions to all appropriate violations helps ensure an accurate ERP list.	with this information quarterly, and link ERP-addressing enforcement actions and/or SOX dates to violations, as appropriate, such that SDWIS/FED accurately represents those actions for each violation affected.					
17.6 – See OECA annual commitment system (ACS) measure (SDWA02) in Attachment A. Commit to address and resolve a specific number of systems between July 2015 and June 2016.		R5 will track State commitments under measure SDWA02 and update State quarterly, engaging in discussion with States on progress, as needed.				

	Table 1. Primacy Activities					
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation			
18.0 – Data Management and Reporting						
18.1.a – State must use the latest version of SDWIS/FedRep to validate and correct errors prior to data submittal. The State must also correct all object errors and as many data quality errors identified by the SDWIS/FED-ODS processing software. These corrections should be submitted before the end of the quarter. Further, States should follow agreed upon protocol (dated 10/5/2006) for transmittal, receipt, and review of output reports by the Region. 18.1.b – For States using SDWIS/State, if they are not using	For each data submission with errors, the State will contact the Region about their plans for fixing the errors. States will keep Region 5 up-to-date on SDWIS/Prime transition plans, if applicable. States include the anticipated target date for using SDWIS/Prime here (or in the data management and reporting work plan summary):	Provide technical assistance and program assistance to all Region 5 States related to data management.				
the most current version of SDWIS/State, they should commit to a timeframe for when that would happen. In addition, the State should list those modules they are not using at all or not fully utilizing, and describe the State's plans or schedule to use them.						
18.1.c – States should continue planning SDWIS/Prime transition schedules and activities in FY16, if applicable.						
Click here to go back to the table of contents (by pressing and holding the "Ctrl" key while clicking the left mouse button).						

Table 1. Primacy Activities						
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation			
18.0 – Data Management and Reporting						
18.2 – Continue to improve inventory reporting to SDWIS/FED, focusing primarily on inventory data quality errors and improving locational data for CWS and NTNCWS intakes, wells, and treatment plants for regional emergency response needs. States are encouraged to report locational data for TNCWS, too, but this is not a requirement.	States indicate here (or in the data management and reporting work plan summary) the target date for when CWS and NTNCWS inventory data reported to SDWIS/FED will be up-to-date (e.g., by the end of the next sanitary survey cycle).	R5 will notify States of any inventory requirement changes when they are documented by EPA headquarters.				
18.3 – Continue to improve the data reliability by the following activities (Data Quality Improvement Plan): 18.3.a – State will commit to full automation, including electronic reporting from labs and automated monitoring schedule generation and system notification. 18.3.b – State will automate the compliance determinations for all rules for which it has primacy. 18.3.c – State will update standard operating procedures, as necessary, to ensure proper compliance determinations are being made. 18.3.d – State will provide timely compliance determination training to staff, particularly for new rules. 18.3.e – The State will ensure the	Since data management is critical to each State's ability to maintain primacy, the State shall send a representative to the annual ASDWA Data Management Users conference.	R5 will evaluate the extent to which TCR and nitrate violations are reported late to SDWIS/FED. R5 expects that compliance determination and violation reporting tool (CDVRT) training will be conducted when all of the modules are completed. Region 5 will assist States with resolving data quality issues, as appropriate and resources allow. Region 5 requests that States copy the region when responding to the annual headquarters survey asking about which States are using various SDWIS/State components.				

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Table 1. Primacy Activities						
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation			
18.0 – Data Management an	d Reporting					
accuracy of the service area						
reporting for school and daycare						
PWSs and make revisions as						
necessary.						
18.3.f – The State will correct						
identified data errors, such as						
violations with compliance period						
begin dates that are reported after a						
PWS's deactivation date.						

Table 1. Primacy Activities					
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation		
19.0 – Annual Compliance I	Report				
19.1 – Prepare and submit an Annual Compliance Report (ACR). Please provide a summary of the number and percentage of systems (by system type) in compliance with monitoring requirements, by rule, as part of this report. Click here to go back to the table of contents (by pressing and holding the "Ctrl" key while clicking the left mouse button).	Due Dates: 7/1/15 and 7/1/16	OECA to provide annual ACR guidance. R5 will forward guidance when received.			
20.0 – Variances and Exemptions					
20.1 – Follow all variance and exemption requirements when variances and exemptions are allowed by the State.	Variances and exemptions are not allowed in Ohio.				

Table 1. Primacy Activities					
Activity Components	State Commitment	Region 5 Activities	State/U.S.	EPA Eva	aluation
21.0 – Conduct Joint Assess	ment of Program Progress U	Ising Evaluation Tools such	as U.S. EPA	A's Strate	egic
Plan and State/U.S. EPA Sh	ared Goals				
21.1 – Gather information to track	Report on status of State's	Compile information and report to		Goal:	EOY:
strategic plan progress.	commitments for measures in U.S.	HQ.	Milestone 1	≥95%	
	EPA's strategic plan.		Milestone 2	≥95%	
State directors will attend the annual		Annually assess each State's	Milestone 3	<5%	
Region 5 State directors' meeting in		progress in attaining the shared	Milestone 4	<10%	
April 2016 to discuss primacy and		goals milestones, and identify	Milestone 5	<5%	
implementation issues.		U.S. EPA or State follow-up	Milestone 6	<10%	
		actions needed to maintain or	Milestone 7	<10%	
Click here to go back to the table of		improve compliance. Negotiate			
contents (by pressing and holding the		appropriate disinvestments with			
"Ctrl" key while clicking the left mouse		States as necessary to ensure that			
<u>button).</u>		the highest priority work is done.			

	Table 1. Primacy Activities				
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation		
21.0 – Conduct Joint Assess	ment of Program Progress U	sing Evaluation Tools such	as U.S. EPA's Strategic		
Plan and State/U.S. EPA Sh	ared Goals				
		Work with State drinking water and ground water programs to increase public understanding of the impacts of budget cuts on public health protection efforts, and assist in State efforts to gain additional program resources. R5 will schedule semi-annual			
		conference calls about every six months to discuss status updates			
		and issues regarding State- specific topics.			

Table 2. Other Activities						
Other Activity	State Commitment	Region 5 Activities State/U.S. EPA Evaluati				
Components						
1.0 – Preparing for Security	Threats at PWSs					
1.1 – The State has adopted and can						
implement an adequate plan for the						
provision of safe drinking water						
under emergency circumstances						
including, but not limited to,						
earthquakes, floods, hurricanes, and						
other natural disasters.						

Table 2. Other Activities					
Other Activity	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation		
Components					
2.0 – Operator Certification					
2.1 – Annually provide		Coordinate information and issues			
documentation to U.S. EPA		on Op Cert Program			
showing the ongoing		implementation, and review and			
implementation of the Operator		approve annual reports.			
Certification Program to avoid 20%					
withholding of the DWSRF					
capitalization grant.					
Due Dates – September 30, 2015					
and September 30, 2016					
and September 30, 2010					
Click here to go back to the table of					
contents (by pressing and holding the					
"Ctrl" key while clicking the left mouse					
button).					
2.2 – For operators of CWSs and NTNCWSs: (1) provide training					
and certification opportunities for					
new operators, and (2) provide					
training and opportunities for					
upgrading and renewing					
certification for existing operators.					

Table 2. Other Activities				
Other Activity	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation	
Components				
2.0 – Operator Certification				
2.3 – Provide supplemental certification and training to water system operators on relevant "Sustainable Water Infrastructure" topics from section 1.0 of the "EPA national and regional priorities" table of the ARDP to ensure sustainable water utilities and water supplies. For example, conduct CEU-eligible training to water operators on supply/demand water efficiency or add supplemental questions on treatment plant energy efficiency activities to certification exams.		As requested, the Region 5 sustainable water infrastructure (SWI) workgroup will provide training and outreach materials to water system operators and technical assistance providers, in coordination with States. Here are four suggestions from R5 on how to improve Ohio's already solid operator certification program, the first two of which are focused on asset management: - Train water operators how to maintain and monitor inventory and replacement life-cycle information for system components; - Teach water operators how to use system inventory and replacement life-cycle information to produce critical need projections for decision- makers; - Inform managers and municipal officials about the benefits and incentives to hire returning veterans; and - Train operators how to conduct Level 1 assessments to satisfy RTCR requirements, if applicable.		

Table 2. Other Activities				
Other Activity	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation	
Components				
3.0 – Capacity Development				
3.1 – Annually provide documentation to U.S. EPA showing the ongoing implementation of both the new systems program and the existing systems strategy to avoid 20% withholding of the DWSRF capitalization grant. Annual report should address the new Capacity Development reporting measures. Due Date – September 30 th Every three years, submit a report to the governor and provide a copy to U.S. EPA on the efficacy of the strategy and the progress made toward improving the capacity of water systems in the State. Due Date – October 1, 2017 Click here to go back to the table of contents (by pressing and holding the		Region 5 will send a reminder to the State about the capacity development annual report in August, annually.		
"Ctrl" key while clicking the left mouse button).				

Table 2. Other Activities			
Other Activity	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
Components			
3.0 – Capacity Development	;		
3.2 – Promote "Sustainable Water Infrastructure" activities as described in section 1.0 of the "national and regional EPA priorities" table of the ARDP in Capacity Development activities and assessments as part of improving the capacity and		As requested, the Region 5 SWI workgroup will provide training and outreach materials and assistance on tools (i.e., Check Up Program for Small Systems (CUPSS)) to water system operators and technical assistance providers, in coordination with	
sustainability of water systems and water supplies. For example, provide technical assistance on starting an asset management program or conduct energy audits for treatment plants.		States.	

Table 2. Other Activities			
Other Activity	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
Components			
4.0 – Source Water Assessn	nents and Protection		
4.1 – Update source water	To complete source water		Ohio EOY: Despite SWAP staff
assessments, including effects of	assessment reports for new public		spending nearly half the fiscal year
climate change, as resources allow.	water systems and to revise		helping out with the Harmful Algal
	assessments, as needed, for systems		Bloom program, they completed
Click here to go back to the table of	that have installed new wells or		source water assessments for 121
contents (by pressing and holding the	substantially changed their		systems. Of these, 72 were for new
"Ctrl" key while clicking the left mouse	pumpage		wells or wellfields and 49 were
button).			revisions of earlier source water
			assessment reports due to new wells
			or changed pumping rates.

Table 2. Other Activities				
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation	
4.0 – Source Water Assessn	nents and Protection			
4.2 – Assist local community source water protection (SWP) plan preparation and implementation, including climate change adaptation activities, in cooperation with Source Water Collaborative (SWC) members (e.g., National Rural Water Association, American Planning Association, and others).	To continue encouraging and assisting Ohio's public water systems to develop written source water protection plans. Also, to monitor implementation via a "SWAP survey" offered online every three years and audited by District staff for accuracy at least once within the three-year period between surveys. Ohio's SWAP program continues to coordinate with the Ohio Rural Water Association to complete local protection plans; quarterly meetings are held with ORWA and FSA. Protection planning efforts for surface water systems always include coordination with the local Soil and Water Conservation District, the local Health Department, the local first responders, regional planning agencies, and any watershed action groups working within the protection area.	Continue to develop tools as needed, foster cross-program coordination, and encourage coordination with SWC partners to encourage broad-based actions at the State and local levels to address potential sources of contamination. Provide states with examples of existing state-wide collaboratives and contacts, as requested (see, for example, the SWC website). Facilitate the development and expansion of State-SWC partnerships. Provide feedback and guidance. Encourage interstate communication through conference calls and an annual State–R5 EPA meeting. The next meeting will be in the spring 2016 at a location TBD. Encourage data sharing with other programs to prioritize permitting and compliance activities in source water areas, for example.	Ohio EOY: Currently 216 municipal systems serving 4.7 million people have endorsed local source water protection plans. Also, 1,478 nonmunicipal systems serving nearly 250,000 people have completed checklist protection plans. Based on 2015 SWAP survey information, with some 2016 updates, 69% of Community Systems serving 87.8% of Ohioans using Community water systems are substantially implementing. Ohio EPA helped organize the Upper Ohio River Joint Protection Plan Update meeting on September 14, 2016, attended by 30 people, including representatives of five local industries. Ohio EPA endorsed the first protection plan for a Lake Erie system (Painesville) on 7/12/2016. On 9/13/16, Ohio EPA participated in Pennsylvania's RAIN meeting for source water protection on the Ohio River below Pittsburgh.	

Table 2. Other Activities			
Other Activity	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
Components			
4.0 – Source Water Assessn	nents and Protection		
4.3 – Report the number of CWSs with SWP plans and the number of CWSs implementing SWP measures (electronically via SDWIS, if possible). For States that do not report via SDWIS, R5 requests that States voluntarily provide a list of system names and/or PWSID numbers that have SWP plans in place and a list of system names and/or PWSID numbers that are substantially implementing SWP as defined by the State as of June 30, 2016 by August 15, 2016. Consider ways to document and	Ohio's SWAP program will continue to provide these data to USEPA Region V via updates to SDWIS.	Maintain and update State information in the Region 5 portion of the SWP report, as requested by EPA HQ.	Ohio EOY: The number of Community public water systems that are substantially implementing was reported as requested, with a list of system names and PWS ID numbers.
track SWP implementation efforts in State data system.			

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
4.0 – Source Water Assessn	nents and Protection		
4.4 – Develop and implement coordinated approaches with other regulatory and voluntary programs to protect both the quality and quantity of source water, particularly in areas of concern.	Ohio's SWAP program commits to focusing on protection planning for surface water systems over the next year, and working with the Division of Surface Water and DDAGW's HABs unit to identify and conduct outreach to the most vulnerable systems. We will coordinate to make available grant funds for watershed protection strategies in watersheds threatened by HABs.	Provide training, technical assistance, and technology transfer capabilities. Facilitate the adoption and sharing of Geographic Information System data bases to support local decision making. Work with Clean Water Act programs (e.g., using the draft CWA/SDWA integration guide and/or the online CWA/SDWA toolkit) to encourage assessment of surface waters for drinking water use, prioritize impaired waters, protect intakes downstream of NPDES-permitted sources, develop TMDLs, and develop tailored approaches to achieve substantial implementation. Review State 303(d) and 305(b) reports (or integrated reports) to recommend opportunities for source water protection.	Ohio EOY: Harmful Algal Blooms were addressed through most of FFY2016 by a HABs unit formed in January, 2016. Please see page SWAP staff assisted with HABs outreach and rule development during the first quarter of FFY2016. SWAP staff are participating in a workgroup formed in FFY 2016 to address ground water in Ohio's Nutrient Reduction Strategy. SWAP staff continue to serve as Information Officer for Ohio's State Coordinating Committee on Ground Water. Ohio's SWAP program hosted the Region 5 State Source Water Protection Managers meeting October 3-5, 2016.

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Table 2. Other Activities			
Other Activity State Commitment		Region 5 Activities	State/U.S. EPA Evaluation
Components			
4.0 – Source Water Assessn	nents and Protection		
		Work with the State to characterize current and future pressures on source water quality and availability. Support voluntary	
		programs, such as WaterSense and other SWI activities, to protect drinking water resources.	
4.5 – Develop and expand SWP program implementation mechanisms, such as climate change adaptation planning, where possible.	Ohio's SWAP program will incorporate climate change planning into Protection Plans, particularly in the contingency planning section, as more guidance becomes available.	Promote the innovative use of DWSRF set-asides and other potential program funding streams.	Ohio's SWAP program will begin incorporating climate change planning into Protection Plans, as more guidance becomes available.

Table 2. Other Activities						
Other Activity	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation			
Components		3				
	5.0 – Conduct Joint Assessment of Program Progress Using the PWSS Program Implementation Report					
5.1 – Review the draft summary		Use the logic model to improve our				
prepared by R5 and assist in filling		ability to understand, measure,				
gaps related to the State's PWSS		assess, and communicate progress.				
program to support the various						
components of the PWSS program						
implementation logic model.						
<i>Note:</i> State-specific measures and						
indicators summaries, which						
include a review of the State-						
specific logic model reporting tool						
data are available via the Quickr						
site (<u>click here</u> or go to https://epaqpx.rtp.epa.gov/Region5s						
tatepwssprograms). See the State-						
specific summaries in each State						
room by clicking on a particular						
State and then clicking on the "OH						
Measures and Indicators" link on						
the left side of the screen. The raw						
logic model data for all Region 5						
States are also available via the						
Quickr site in the "Region 5						
Measures and Indicators" room and						
the "Logic model reporting tool"						
sub-room.						
Click here to go back to the table of						
contents (by pressing and holding the						
"Ctrl" key while clicking the left mouse						
button).						

Table 3. National and Regional EPA Priorities			
Other Activity Components State Commitment		Region 5 Activities State/U.S. EPA Evalua	
1.0 – Sustainable Water Inf	rastructure		
1.1 – Enable water system and water supply sustainability by providing incentives through DWSRF set-asides and grant criteria, providing training, and encouraging sustainable water infrastructure (SWI) activities, including, for example, those related to water and/or energy efficiency, asset management, and climate change adaptation and mitigation activities. SWI is important to the success of other activities in this work plan, including source water protection, DWSRF, operator certification, capacity development, and all-hazards resiliency approaches, etc. Click here to go back to the table of contents (by pressing and holding the "Ctrl" key while clicking the left mouse button).	Please include here the State's commitment, either ongoing or future, to document support for sustainable infrastructure initiatives. Examples might include the dedication of a coordinator, or a statement of intent to hold or participate in a water efficiency, sustainable water infrastructure, or climate change conference.	Region 5 staff participate in a region-wide SWI workgroup created to develop and share information about the cost savings and benefits of investments in SWI initiatives, including WaterSense. Region 5 staff participate in regional and national EPA climate change adaptation/mitigation workgroups that share information about ongoing initiatives. R5 to engage States to discuss and identify what, if any, sustainable water infrastructure/climate change efforts are priorities.	

Table 3. National and Regional EPA Priorities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
2.0 – Environmental Justice	e		
2.1 – Provide incentives through DWSRF set-asides and grant criteria or otherwise promote and encourage environmental justice. Click here to go back to the table of contents (by pressing and holding the "Ctrl" key while clicking the left mouse button).	Please include here the State's commitment, either ongoing or future, to document support for environmental justice efforts.	R5 has the capability to provide States with draft GIS maps that show areas with environmental justice concerns through EJSCREEN, which we anticipate will be introduced to the States by summer 2015. States currently have access to the public tool, EJView, available online at: http://epamap14.epa.gov/ejmap/entry.html .	

Attachment A: Linking the Strategic Plan to this Work Plan

This continuing program grant is consistent with U.S. EPA's Strategic Plan Goal 2: Clean and Safe Water, which calls for protecting public health by providing safe drinking water. Many of the grant work plan activities contribute to the goal of assuring that people served by public water systems receive drinking water that meets all applicable standards through effective treatment and source water protection. Continuing program implementation includes adopting rules at least as stringent as federal regulations, providing assistance to public water systems on regulatory requirements, conducting sanitary surveys, ensuring that monitoring and follow-up is conducted, and enforcing regulations.

Table 4. Final FY 2016-2017 National Water Program Guidance:
OW and OECA National Program Manager (NPM) Guidance Regional Targets and Program Activity Measures¹

OW ACS code
SDW-211
SDW-SP1.N11
SDW-SP2
SDW-SP4a
SDW-SP4b
SDW-01a
SDW-04
SDW-05
SDW-11
SDW-15
SDW-17
SDW-21
OECA ACS code

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 $^{^1}$ The information in Table 4 is based on final FY2016-2017 OW and OECA measures at: http://www2.epa.gov/sites/production/files/2015-02/documents/fy_2016-2017_nwpg_narrative_2015.pdf (Appendix A) and http://www2.epa.gov/sites/production/files/2015-04/documents/fy1617oecanpmguidance.pdf (Appendix 2), respectively.

Attachment B: State-specific Measures and Indicators Summaries

State-specific measures and indicators summaries, which include the above NPM guidance targets and measures, as well as the Region 5 shared goals, logic model reporting tool data, and Region 5 high priority queries are available via the Quickr site (click here or go to https://epaqpx.rtp.epa.gov/Region5statepwssprograms). See the State-specific summaries in each State room by clicking on a particular State and then clicking on the "OH Measures and Indicators" link on the left side of the screen. The raw data for all Region 5 States are also available via the Quickr site in the "Region 5 Measures and Indicators" room.

You'll be asked for your user name and password to access the Quickr site. For EPA staff, your user name is your Lotus Notes user name (first name and last name, such as "John Smith"), and your password is your Lotus Notes password. For State staff, you selected your user name and password when you registered for the site. If you need to register for the Quickr site, please contact your State Program Manager:

Ohio: Wendy Drake (<u>drake.wendy@epa.gov</u>; (312) 886-6705)

Note: EPA is transitioning to SharePoint, and we'll eventually have new access and registration information available for State staff.

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